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1254. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1255. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1256. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1257. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1258. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1259. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017
1260. Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 4, 2018
1261. Conservative Declaration that Material is a Hazardous Waste	ENCORE	JAN 11, 2018
1262. Defining Criteria for Household Waste Exclusion	ENCORE	JAN 18, 2018
1263. The Household Waste Exclusion and Renovation Debris	ENCORE	JAN 25, 2018
1264. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	FEB 1, 2018
1265. The Mixtures Rule – Washington State vs. The Feds	ENCORE	FEB 8, 2018
1266. Spent Lead-Acid Batteries and Secondary Containment	ENCORE	FEB 15, 2018
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1268. CERCLA Hazardous Substances – A Brief Definition	ENCORE	MAR 1, 2018
1269. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris	ENCORE	MAR 8, 2018
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1271. Who Wants to be a Generator!!!	ENCORE	MAR 22, 2018
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1275. Aqueous Solutions and the Characteristic of Ignitability	ENCORE	APR 19, 2018
1276. PCB Bulk Product Wastes and the One Year Disposal Requirement	ENCORE	APR 26, 2018
1277. PCB Radioactive Wastes and Exception Reporting	ENCORE	MAY 3, 2018
1278. TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date	ENCORE	MAY 10, 2018
1279. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	MAY 17, 2018
1280. Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation		MAY 24, 2018
1281. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit	ENCORE	MAY 31, 2018
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1284. Hazardous Waste Determinations and Phase Separation	ENCORE	JUN 20, 2018
1285. PCB Certificates of Disposal and Manifesting Between Related Facilities		JUN 28, 2018
1286. PCB Concentrations and 10,000 PPM	ENCORE	JUL 5, 2018
1287. PCB Concentrations and 1,000 PPM	ENCORE	JUL 12, 2018
1288. Satellite Accumulation Containers and the Date of Accumulation Marking		JUL 19, 2018
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1290. Satellite Accumulation Areas and Under the Control of the Operator		AUG 2, 2018
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1300. Purpose of the ≤90-day Hazardous Waste Accumulation Conditional Exclusion	ENCORE	OCT 11, 2018
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1308. Disposal Requirements for Hazardous Waste Treated to LDR Standards	ENCORE	DEC 6, 2018
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1311. Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	DEC 27, 2018
1312. RCRA Personnel Training and Classroom Training vs. Online Training	ENCORE	JAN 3, 2019
1313. Absorbent Additions and Treatment	ENCORE	JAN 10, 2019

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CHPRC Environmental Protection, Hanford, WA

SUBJECT: ABSORBENT ADDITIONS AND TREATMENT

DATE: JANUARY 10, 2019

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Lorna Dittmer Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Jim Leary Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Absorbent Additions and Treatment

Q: A generator at a permitted TSDf has three containers of hazardous waste that include small amounts of liquid. One waste container was just generated; another waste container was just repackaged; and the other waste container has been in storage in its original container. The customer wants to add absorbent to the waste containers to address the small amounts of liquid. Considering the above three container scenarios, when is a treatment permit required for the absorbent addition?

A: [WAC 173-303-600\(3\)\(k\)](#) [[40 CFR 264.1\(g\)\(10\)](#)], and [WAC 173-303-400\(2\)\(c\)\(vi\)](#) [[40 CFR 265.1\(c\)\(13\)](#)], state that the following is not applicable to the final facility standards or interim status standards:

“The addition, by a generator, of absorbent material to waste in a container, or of waste to absorbent material in a container, provided that these actions occur at the time the waste is first placed in containers or, in the case of repackaging of previously containerized waste into new containers, at the time the waste is first placed into the new containers and the generator complies with WAC 173-303-200 (1)(b) and 173-303-395 (1)(a) and (b)...”

As stated in the February 25, 1982, Federal Register on page 8305:

“The Agency does not believe that these treatment practices [addition of absorbent], when employed at the time hazardous wastes have been first placed in containers, pose a substantial hazard to human health or the environment.”

“However, the Agency is not convinced that these treatment practices, when employed at a time after hazardous waste have been emplaced in containers, pose no substantial hazard. This is because such container must be opened in order to employ these practices.”

Concerning the three waste containers, the treatment permit exemption would apply to the waste that was just generated, and to the waste that was just repackaged to a new container. The addition of absorbent under these two scenarios occurred at the time the waste was first placed in the container or when repackaged to a new container and therefore a treatment permit is not required.

The treatment permit exemption would not apply to the waste that had been in storage in its original container. If the generator added absorbent later, EPA contends that this is treatment requiring a permit or some other mechanism like treatment by generator.

SUMMARY:

- The addition of absorbent to hazardous waste containers can be exempt from treatment permits.
- If absorbent is added to a container when waste is first added to a container, or when the waste is first placed into a new container, the treatment permit exemption is applicable.
- If absorbent is added to the container after some time, the treatment permit exemption is not applicable.

Nothing is attached to the e-mail. If you have any questions, contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 1/10/19

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