

| <u>SUBJECT</u> | | <u>DATE</u> |
|----------------|---|------------------------|
| 1320. | Treated Hazardous Waste Used as Dust Suppressant | FEB 28, 2019 |
| 1321. | Decharacterized RCRA Waste - Manifesting and LDR Reporting | ENCORE MAR 7, 2019 |
| 1322. | Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics | ENCORE MAR 14, 2019 |
| 1323. | Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition | ENCORE MAR 21, 2019 |
| 1324. | Decharacterized Wastes and the LDR Dilution Prohibition | ENCORE MAR 28, 2019 |
| 1325. | PCB Decontamination Standard with No Decontamination Performed | ENCORE APR 4, 2019 |
| 1326. | PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? | ENCORE APR 11, 2019 |
| 1327. | PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel | ENCORE APR 18, 2019 |
| 1328. | PCB Concentrations and Micrograms per Centimeters Squared (µg/cm ²) | ENCORE APR 25, 2019 |
| 1329. | Operating Record vs. Operating Log | ENCORE MAY 2, 2019 |
| 1330. | Operating Records Not Referenced in the “Operating Record” Regulations | ENCORE MAY 9, 2019 |
| 1331. | Washington State Used Oil and Mixtures with Other Materials | ENCORE MAY 16, 2019 |
| 1332. | Used Oil Filter Regulation – The Feds vs. Washington State | ENCORE MAY 23, 2019 |
| 1333. | Printed Circuit Board Recycling – Shredded vs. Whole | ENCORE MAY 30, 2019 |
| 1334. | Universal Waste Alkaline Batteries and Self-Transportation | ENCORE JUN 6, 2019 |
| 1335. | Universal Waste Lithium Batteries and Self-Transportation | ENCORE JUN 13, 2019 |
| 1336. | RCRA Hazard Labeling – A Random Scenario | ENCORE JUN 20, 2019 |
| 1337. | Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch | ENCORE JUN 27, 2019 |
| 1338. | Unused Paraformaldehyde - U Listed Hazardous Waste or Not? | ENCORE JUL 3, 2019 |
| 1339. | The Hazardous Waste Characteristic of Reactivity (D003) | ENCORE JUL 11, 2019 |
| 1340. | Central Accumulation Areas and Signage Requirements | ENCORE JUL 18, 2019 |
| 1341. | RCRA EPA Identification Numbers – Site Specifics | ENCORE JUL 25, 2019 |
| 1342. | RCRA EPA Identification Numbers – Transporters | ENCORE AUG 1, 2019 |
| 1343. | Paint Wastes and the Applicability of the F001-F005 Listings to Ingredients | ENCORE AUG 8, 2019 |
| 1344. | F Listings and Ingredients in Commercial Chemical Product Formulations | ENCORE AUG 15, 2019 |
| 1345. | PCB Containers and ≥50 ppm | ENCORE AUG 22, 2019 |
| 1346. | CERCLA Hazardous Substances – The Petroleum Exclusion | ENCORE AUG 29, 2019 |
| 1347. | PCB Concentration Assumptions for Use vs. PCB Disposal | ENCORE SEP 5, 2019 |
| 1348. | RCRA LR One-Year Storage Prohibition vs., PCB One-Year Disposal Time Limit | ENCORE SEP 12, 2019 |
| 1349. | Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978 | ENCORE SEP 19, 2019 |
| 1350. | Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978 – A Follow-Up | ENCORE SEP 26, 2019 |
| 1351. | PCB Waste Regulation and April 18, 1978 vs. July 2, 1979 | ENCORE OCT 3, 2019 |
| 1352. | PCB Waste Storage Limitations and the One-Year Extension | ENCORE OCT 10, 2019 |
| 1353. | PCB Waste Storage Limitations and the PCB Radioactive Waste Exemption | ENCORE OCT 17, 2019 |
| 1354. | LDR One-Year Storage Prohibition and Generator Permitted Storage | ENCORE OCT 24, 2019 |
| 1355. | LDR Notification/Certification and Generator Permitted Storage | ENCORE OCT 31, 2019 |
| 1356. | Disposing of PCB Ballasts with PCB Potting Material | ENCORE NOV 7, 2019 |
| 1357. | Fluorescent Light Ballasts and PCB Annual Reporting | ENCORE NOV 14, 2019 |
| 1358. | Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents | ENCORE NOV 21, 2019 |
| 1359. | Multiple Characteristic and Listed Hazardous Waste Codes and the “in lieu of” LDR Principle | ENCORE NOV 26, 2019 |
| 1360. | Universal Waste Lamps and Prohibition on Crushing | ENCORE DEC 5, 2019 |
| 1361. | Used Oil and Weekly Inspections | ENCORE DEC 12, 2019 |
| 1362. | Used Oil and Keeping Containers Closed – Washington State vs. the Feds | ENCORE DEC 19, 2019 |
| 1363. | ’Twas the Night Before Christmas – The Twenty-Sixth Annual Edition | ENCORE DEC 24, 2019 |
| 1364. | Generator Weekly Inspection Log Documentation – Federal vs. WA State | ENCORE JAN 2, 2020 |
| 1365. | PCB Reporting and Recordkeeping Relief | ENCORE JAN 9, 2020 |
| 1366. | Satellite Accumulation and Product Vessel Cleanouts | ENCORE JAN 16, 2020 |
| 1367. | TSDF Requirements When Shipping Dangerous Waste to another TSDF | ENCORE JAN 23, 2020 |

TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

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

SUBJECT: TSDF REQUIREMENTS WHEN SHIPPING DANGEROUS WASTE TO ANOTHER TSDF

DATE: JANUARY 23, 2020

| <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 Laura Cusack John Dent Lorna Dittmer Stuart Hildreth Mike Jennings Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jeff Westcott | Jeff Bramson Bob Bullock Frank Carleo Danielle Collins Bill Cox Jeanne Elkins Ryan Fisher Jonathan Fullmer Ted Hopkins Barry Lawrence Jim Leary Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Linda Petersen Fred Ruck Sean Sexton Dave Shea Ray Swenson Kat Thompson Wayne Toebe Eric Trotta Daniel Turlington Dave Watson | Brett Barnes Michael Carlson Mike Demiter Kip George Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Matt Mills Carly Nelson Michelle Oates Eric Pennala Jon Perry Christina Robison Christian Seavoy David Shaw John Skogleie Lana Strickling Greg Sullivan | (TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Al Farabee Tony McKarns | Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Mike Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Kirk Peterson | Dan Saueressig Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley |

Approved for Public Release;
Further Dissemination Unlimited

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING

SUBJECT: TSDF Requirements When Shipping Dangerous Waste to another TSDF

Q: A RCRA permitted treatment, storage and disposal facility (TSDF) has several containers of dangerous/hazardous waste, all generated by the “We Say So” (WSS) Corporation. The TSDF has accepted the waste containers into permitted storage and treated the waste to meet the Land Disposal Restrictions (LDR) treatment standards. The TSDF plans to ship the containers to an offsite TSDF for disposal. The TSDF assigned a new shipper in the midst of on-the-job training to complete the manifest for this offsite shipment. The new shipper is not sure whom to list as the generator on the [manifest in Item 5](#) – the original generator, WSS, or the current TSDF. Where in [WAC 173-303](#) can the new shipper go to understand who the generator for this shipment is?

A: The new shipper can go to [WAC 173-303-280](#), [40 CFR [264.71\(c\)/265.71\(c\)](#)], “General requirements for dangerous waste management facilities” (a.k.a., TSDFs), which states:

“Whenever a shipment of dangerous waste is initiated from a facility, the owner or operator of that facility must comply with the requirements for generators, WAC 173-303-170 through 173-303-230.”

This means that once the TSDF has accepted the waste for permitted storage, the TSDF becomes the generator of the waste when the TSDF initiates a subsequent offsite waste shipment. As a generator, the TSDF must send the waste via a manifest to a RCRA permitted designated facility in compliance with all the applicable generator standards of WAC 173-303-170 through 173-303-230 [[40 CFR 262](#)]. EPA clarified this requirement in an October 1999 RCRA Hotline Monthly Report entitled, “Manifesting Hazardous Waste Shipments between Treatment, Storage, and Disposal Facilities”, [RO 14408](#).

Note, that if the TSDF had not accepted the original generator's waste due to unresolved manifest discrepancies, the TSDF could have rejected the waste back to the original generator or re-routed the waste to an alternate permitted TSDF. In those cases, the original generator would be identified on the manifest. However, since the new shipper's TSDF had accepted the generator's waste into permitted storage, a subsequent offsite shipment would be subject to all applicable generator standards, i.e., the TSDF is the generator.

SUMMARY:

- A TSDF that initiates an offsite shipment of hazardous waste is subject to the applicable generator standards.
- The waste, among other things, must be manifested to the subsequent offsite TSDF.
- The TSDF initiating the shipment would be identified as the “Generator” in item 5 of the manifest.

Excerpts from WAC 173-303-280 and 40 CFR 264.71 and the October 1999 RCRA Hotline Monthly Report are attached to the e-mail. If you have any questions, please contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: TSDF Requirements When Shipping Dangerous Waste to another TSDF

WAC 173-303-280 **General requirements for dangerous waste management facilities.**

(1) Applicability. The requirements of WAC 173-303-280 through 173-303-395 apply to all owners and operators of facilities which store, treat, or dispose of dangerous wastes and which must be permitted under the requirements of this chapter 173-303 WAC, unless otherwise specified in this chapter. Whenever a shipment of dangerous waste is initiated from a facility, the owner or operator of that facility must comply with the requirements for generators, WAC 173-303-170 through 173-303-230.

WAC 173-303 **Table of Contents** (*Excerpt*)

Section 170. Requirements for generators of dangerous waste.
Section 171. Conditions for exemption for a small quantity generator.
Section 172. Conditions for exemption for a medium quantity generator that accumulates dangerous waste.
Section 173. Alternative standards for episodic generation.
Section 174. Satellite accumulation area regulations for medium quantity generators and large quantity generators.
Section 180. Manifest.
Section 190. Preparing dangerous waste for transport.
Section 200. Conditions for exemption for a large quantity generator that accumulates dangerous waste.
Section 201. Preparedness, prevention, emergency procedures and contingency plans for large quantity generators.
Section 202. Reserved.
Section 210. Generator recordkeeping.
Section 220. Generator reporting.
Section 230. Special conditions.

PART 264 – STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

40 CFR §264.71 **Use of manifest system**

(c) Whenever a shipment of hazardous waste is initiated from a facility, the owner or operator of that facility must comply with the requirements of part 262 of this chapter. The provisions of §§262.15, 262.16, and 262.17 of this chapter are applicable to the on-site accumulation of hazardous wastes by generators. Therefore, the provisions of §§262.15, 262.16, and 262.17 of this chapter only apply to owners or operators who are shipping hazardous waste which they generated at that facility or operating as a large quantity generator consolidating hazardous waste from very small quantity generators under §262.17(f).

40 CFR 262, Subpart A **Table of Contents** (*Excerpt*)

[40 CFR 262.15](#) Satellite accumulation area regulations for small and large quantity generators
[40 CFR 262.16](#) Conditions for exemption for a small quantity generator that accumulates hazardous waste
[40 CFR 262.17](#) Conditions for exemption for a large quantity generator that accumulates hazardous waste

FROM: Paul W. Martin

DATE: 01/23/20

FILE: 2MT\2020\012320.rtf

PG: 2

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: TSDF Requirements When Shipping Dangerous Waste to another TSDF

EPA530-R-99-012j
SUB-9224-99-010

RCRA/SUPERFUND HOTLINE MONTHLY REPORT
October 1999

1. Manifesting Hazardous Waste Shipments between Treatment, Storage, and Disposal Facilities

A permitted treatment, storage, and disposal facility (TSDF) receives a manifested shipment of hazardous waste from a generator. The owner and operator of the TSDF partially treats the waste before sending it off site for continued treatment. Are the owner and operator of the TSDF responsible for initiating a new manifest to accompany, or should the original manifest accompany the shipment?

The owner and operator of a TSDF who initiates a shipment of hazardous waste must comply with the requirements in 40 CFR Part 262 (see, e.g., §§264/265.71(c)). Therefore, the owner and operator of a TSDF that sends waste off site for continued treatment must prepare a new manifest for that waste, and must also comply with the requirements for exception reporting found in §262.42. After receiving the waste and signing the manifest, the TSDF, which will conduct further treatment, must send a signed copy of the manifest to the original TSDF.

RO 14408

FROM: Paul W. Martin

DATE: 01/23/20

FILE: 2MT\2020\012320.tif

PG: 3

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.