

<u>SUBJECT</u>		<u>DATE</u>
1188. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190. Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191. Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192. Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193. Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194. Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195. Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196. Hazardous Waste Determinations and Phase Separation		OCT 6, 2016
1197. Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198. PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016
1199. PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 2016
1200. PCB Analytical Waste Disposal Requirements – Water vs. Organic Liquids and Non-aqueous Inorganic Liquids		NOV 3, 2016
1201. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	NOV 10, 2016
1202. Purpose of the ≤90-day Hazardous Waste Accumulation Exemption		NOV 17, 2016
1203. Used Oil Eligibility for Turkey and Ham Oils	ENCORE	NOV 23, 2016
1204. PCB Reporting and Recordkeeping Relief	ENCORE	DEC 1, 2016
1205. Defining Criteria for Household Waste Exclusion	ENCORE	DEC 8, 2016
1206. The Household Waste Exclusion and Renovation Debris	ENCORE	DEC 15, 2016
1207. 'Twas the Night before Christmas – The Twenty-Fourth Annual Edition		DEC 24, 2016
1208. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	DEC 29, 2016
1209. Absorbent Additions and Treatment		JAN 5, 2017
1210. Frozen RCRA Wastewater - DOT Liquid or Solid When Manifested?	ENCORE	JAN 12, 2017
1211. DOT Marking Specifications for the "UN", "NA" and "ID" Markings		JAN 19, 2017
1212. Satellite Accumulation within a ≤90-day Accumulation Area	ENCORE	JAN 26, 2017
1213. Washington State-Only Dangerous Waste Markings vs. Hazardous Waste Markings	ENCORE	FEB 2, 2017

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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:** Washington State-Only Dangerous Waste Markings vs. Hazardous Waste Markings

**DATE:** FEBRUARY 2, 2017

<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 Roni Ashley Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Ron Brunke Bob Bullock Bill Cox Laura Cusack Lorna Dittmer Ted Hopkins Sasa Kosjerina Jim Leary Rick Oldham Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple 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 Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Marty Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** Washington State-Only Dangerous Waste Markings vs. Hazardous Waste Markings

**Q:** A Washington state customer has a drum of WA State-Only dangerous waste, i.e., there are no RCRA federal hazardous waste codes associated with the waste. The WA customer understands that during accumulation, a Federal hazardous/dangerous waste container must be marked with the words “Hazardous Waste” or “Dangerous Waste”, the date of accumulation, and the major risk(s). At the time of transport the Federal hazardous/dangerous waste container must also be marked with the following or equivalent words and information:

*“HAZARDOUS WASTE - State and federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington state department of ecology or the United States Environmental Protection Agency.”*

The generator's name and address and manifest tracking number must also be included.

But what about a container of Washington State-Only Dangerous Waste, i.e., WT01, WT02, WP01-WP03 and/or WSC2 and no F, K, U, P or D hazardous waste codes, and no DOT hazard classes? Does the generator mark the WA state-only dangerous waste container in the same way as a Federal hazardous/dangerous waste container?

**A:** Per [WAC 173-303-190\(5\)](#), “Preparing dangerous waste for transport”, before transport a WA state-only dangerous waste that is not regulated as a RCRA hazardous waste or as a DOT hazardous material must be packaged in a container equivalent to a DOT approved container. Each package, ≤1,000 gallons, must be marked:

*“Washington State Dangerous Waste-State law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology.”*

The generator's name and address and manifest number must also be included. Per [WAC 173-303-180\(6\)](#) the manifest must also include a WA State shipping description as appropriate. Examples include:

*“Material Not Regulated by DOT (Washington State Dangerous Waste Only, Toxic)”*

*“Material Not Regulated by DOT (Washington State Dangerous Waste Only, Toxic, Persistent)”*

*“Material Not Regulated by DOT (Washington State Dangerous Waste Only, Solid Corrosive)”*.

Therefore, in comparison to a Federal hazardous waste container, the WA state-only dangerous waste container must have WA specific “if found” wording and the manifest must use a WA specific shipping description describing the state-only waste as not regulated by DOT and include the specific WA State criteria that the waste meets, i.e., toxic for WT01, WT02 wastes; persistent for WP01-WP03 wastes; or solid corrosive for WSC2 wastes.

### SUMMARY:

- WA state-only dangerous waste must be marked before transport with:
  - *“Washington State Dangerous Waste-State law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology.”*
  - The generator's name and address and manifest number must also be included.
  - *Material Not Regulated by DOT (Washington State Dangerous Waste Only, Toxic or Toxic Persistent or Solid Corrosive)* – as an example.

Excerpts from WAC 173-303-190 and WAC 173-303-180 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.

**FROM:** Paul W. Martin

**DATE:** 020217

**FILE:** 2MT\2017\020217.rtf

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Washington State-Only Dangerous Waste Markings vs. Hazardous Waste Markings

### **WAC 173-303-190      Preparing dangerous waste for transport.**

(5) State-only dangerous waste that is not regulated as a hazardous waste under 40 C.F.R. Part 261 or as a hazardous material under 49 C.F.R. must fulfill the following requirements before transport:

- (a) Package in a nonleaking, nonsievable container or in a package that is equivalent to the manufacturing and testing specifications for packagings and containers of 49 C.F.R. Parts 173, 178 and 179.
- (b) Mark each package containing one thousand gallons or less with the following:
  - (i) Washington State Dangerous Waste-State law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the Washington State Department of Ecology. The generator's name and address and manifest number must also be included; and
  - (ii) The state shipping description as described in WAC 173-303-180(6).
- (c) Use of any other markings for a state-only dangerous waste is prohibited.

### **WAC 173-303-180      Manifest.**

(6) Special instructions for state-only dangerous waste that designates only by the criteria under WAC 173-303-100 and is not regulated as a hazardous waste under 40 C.F.R. Part 261 or as a hazardous material under the 49 C.F.R. hazardous material regulations. For purposes of completing the uniform hazardous waste manifest, Item 9b, and Item 28 if continuation sheet 8700-22A is used, or to describe a state-only dangerous waste on a shipping paper, the shipping description must include the following in sequence with no additional information interspersed:

- (a) Material Not Regulated by DOT;
- (b) Washington State Dangerous Waste Only followed by the appropriate criteria designation of the waste that is either toxic, persistent, solid corrosive or a combination of these entered in parentheses;
- (c) Shipping description examples: Material Not Regulated by DOT (Washington State Dangerous Waste Only, Toxic); Material Not Regulated by DOT (Washington State Dangerous Waste Only, Toxic, Persistent); Material Not Regulated by DOT (Washington State Dangerous Waste Only, Solid Corrosive).

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