

| <u>SUBJECT</u> | | <u>DATE</u> |
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| 1056. | Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit | ENCORE APR 23, 2015 |
| 1057. | Decharacterized RCRA Waste - Manifesting and LDR Reporting | ENCORE APR 30, 2015 |
| 1058. | Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics | ENCORE MAY 7, 2015 |
| 1059. | Decharacterized Wastes, <90-Day Accumulation Time Limits and LDR Storage Prohibition | ENCORE MAY 14, 2015 |
| 1060. | Decharacterized Wastes and the LDR Dilution Prohibition | ENCORE MAY 21, 2015 |
| 1061. | Hazardous Debris Macroencapsulation and Size Reduction | ENCORE MAY 28, 2015 |
| 1062. | Universal Waste Lamps and Prohibition on Crushing | JUN 4, 2015 |
| 1063. | F003 Listed Hazardous Waste and the 10% Rule | ENCORE JUN 11, 2015 |
| 1064. | F001 - F005 Listed Hazardous Waste and the 10% Rule | ENCORE JUN 18, 2015 |
| 1065. | Macroencapsulation of Hazardous Debris and Presence of Free Liquids | ENCORE JUN 25, 2015 |
| 1066. | DOT Shipping of Damaged, Defective or Recalled Lithium Batteries | JUL 1, 2015 |
| 1067. | Used Oil Eligibility for Animal and Vegetable Oils | ENCORE JUL 9, 2015 |
| 1068. | Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils | JUL 16, 2015 |
| 1069. | Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction | ENCORE JUL 23, 2015 |
| 1070. | Conditioned Exclusion for Characteristic Debris Treated via Immobilization | JUL 30, 2015 |
| 1071. | RCRA Personnel Training and Classroom Training vs. Online Training | AUG 6, 2015 |
| 1072. | PCB Decontamination Standards with No Decontamination Performed | AUG 13, 2015 |
| 1073. | PCB Manifest Exceptions a.k.a. When is a PCB Manifest Not Required | ENCORE AUG 19, 2015 |
| 1074. | PCB Manifest Relief a.k.a. When is a PCB Manifest Not Required – The Sequel | AUG 27, 2015 |
| 1075. | Hazardous Debris and Radioactively Contaminated Cadmium Batteries | ENCORE SEP 3, 2015 |
| 1076. | Hazardous Debris and Radioactively Contaminated Lead Acid Batteries | ENCORE SEP 10, 2015 |
| 1077. | Mercury Wet Cell Batteries - Debris or Not Debris | ENCORE SEP 17, 2015 |
| 1078. | Hazardous Debris and Non-Radioactive Lead Acid Batteries | SEP 24, 2015 |
| 1079. | Unused Paraformaldehyde - U Listed Hazardous Waste or Not? | ENCORE OCT 1, 2015 |
| 1080. | CAS Numbers and the Hazardous Waste "U" and "P" Listings | ENCORE OCT 8, 2015 |
| 1081. | Universal Waste One Year Accumulation and Multiple Handlers | ENCORE OCT 15, 2015 |
| 1082. | LDR Notifications and F001-F005 Constituents of Concern | ENCORE OCT 29, 2015 |
| 1083. | LDR Notifications and F001-F005 Constituents of Concern – Again | ENCORE NOV 5, 2015 |
| 1084. | LDR Notifications and F001-F005 Constituents of Concern - One Last Time | ENCORE NOV 12, 2015 |
| 1085. | DOT and Terminal Protection of Alkaline Batteries | ENCORE NOV 19, 2015 |
| 1086. | Used Oil and Keeping Containers Closed – WAC 173-303 vs. 40 CFR 279 | ENCORE NOV 24, 2015 |
| 1087. | PCB Weight Determinations | ENCORE DEC 3, 2015 |
| 1088. | Satellite Accumulation Requirements and Container Inspections | ENCORE DEC 10, 2015 |
| 1089. | 'Twas The Night Before Christmas - The Twenty-Third Annual Edition | ENCORE DEC 24, 2015 |
| 1090. | Satellite Accumulation and 85-Gallon Containers | ENCORE DEC 31, 2015 |
| 1091. | PCB Date Removed From Service Notations – On the Item or In a Log | ENCORE JAN 7, 2016 |
| 1092. | The Date Removed From Service Marking on the PCB Mark | ENCORE JAN 14, 2016 |
| 1093. | Generator Weekly Inspection Log Documentation – Federal vs. WA State | ENCORE JAN 21, 2016 |
| 1094. | Used Oil and Weekly Inspections | ENCORE JAN 28, 2016 |
| 1095. | TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date | ENCORE FEB 4, 2016 |
| 1096. | PCB Containers and Multiple Removed From Service Dates | ENCORE FEB 11, 2016 |
| 1097. | Generator Inspection Logs and Corrective Action Documentation | ENCORE FEB 18, 2016 |

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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: GENERATOR INSPECTION LOGS AND CORRECTIVE ACTION DOCUMENTATION

DATE: FEBRUARY 18, 2016

| <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> |
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| Richard Austin Roni Ashley Tania Bates Bob Cathel 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 Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters Jeff Widney | Brett Barnes Mitch Boyd Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Sasa Kosjerina Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams | Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Christina Robison Don Rokkan Lana Strickling Lou Upton | (TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine | Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts 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 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 Jeff Westcott Ted Wooley |

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TWO MINUTE TRAINING

SUBJECT: Generator Inspection Logs and Corrective Action Documentation

Q: What are the Federal and the State of Washington generator requirements for documenting less-than-90-day container inspections and any subsequent corrective actions?

A: Per [40 CFR 262.34](#), a generator may accumulate hazardous waste on-site for 90 days or less without a permit provided that (among other things), the waste is placed in containers and the generator conducts at least weekly inspections. The generator inspection regulations referenced at [40 CFR 265.174](#) from 40 CFR 262.34 state that inspections must include looking for leaking containers and deterioration of containers. 40 CFR 265.174 includes a comment to see [40 CFR 265.171](#), “Condition of containers” for remedial action required if deterioration or leaks are detected. However, there is no requirement to document the weekly inspections or the corrective actions taken. Therefore, generators subject to Federal or Federally equivalent State regulations are not required to document weekly inspections or subsequent corrective actions. However, documentation is a best management practice to ensure that regulatory compliance can be demonstrated to regulators, and documentation is a good demonstration.

[Note: In the [September 25, 2015, Federal Register](#) on page 57952, top of 3rd column, EPA proposed modifying the generator accumulation regulations to require generators to document weekly container inspections and keep a log of inspections at the site for at least three years. The Final rule is pending.]

Per the Washington Administrative Code (WAC), [173-303-200](#), Washington State generators may also accumulate dangerous waste on-site for 90 days or less without a permit provided that (among other things), the waste is placed in containers and the generator conducts at least weekly inspections looking for leaking containers and deterioration of containers and the containment system. Note that the WAC requirement to inspect the containment system is more stringent than the Federal requirements which only inspect the containers. The regulation concerning generator inspections at [WAC 173-303-630\(6\)](#) and referenced from WAC 173-303-200, includes wording stating that the generator must keep an inspection log noting the observations made and the nature of any repairs or remedial actions. Therefore, Washington State generators, unlike current Federal generators, are required to document weekly inspections and any subsequent corrective actions taken.

SUMMARY:

- Generators subject to Federal or WA regulations can accumulate hazardous/dangerous wastes on-site for ≤90 days without a permit, provided that (among other things), at least weekly inspections are conducted.
- Current federal regulations require that generators look for leaks and deterioration but do not require documentation of inspections performed or corrective actions taken.
- Washington State regulations also require generators to look for leaks and deterioration but do require documentation of inspections performed and corrective actions taken.

Pertinent regulations from 40 CFR 265 and WAC 173-303 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: 2/18/16

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Generator Inspection Logs and Corrective Action Documentation

40 CFR 262.34 Accumulation time.

(a) Except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

(1) The waste is placed:

(i) In containers and the generator complies with the applicable requirements of **subparts I, AA, BB, and CC** of part 265;

Subpart I—Use and Management of Containers

40 CFR 265.174 Inspections.

At least weekly, the owner or operator must inspect areas where containers are stored, except for Performance Track member facilities that must conduct inspections at least once each month, upon approval by the Director. To apply for reduced inspection frequency, the Performance Track member facility must follow the procedures described in §265.15(b)(5) of this part. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors.

[Comment: See §265.171 for remedial action required if deterioration or leaks are detected.]

40 CFR 265.171 Condition of containers.

If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements of this part.

WAC 173-303-200 Accumulating dangerous waste on-site.

(1) A generator, not to include transporters as referenced in WAC 173-303-240(3), may accumulate dangerous waste on-site without a permit for ninety days or less after the date of generation, provided that:

(b)(i) The waste is placed in containers and the generator complies with **WAC 173-303-630** (2), (3), (4), (5), **(6)**, (8), (9), (10), and 40 CFR Part 265 Subparts AA, BB, and CC incorporated by reference at WAC 173-303-400 (3)(a).

WAC 173-303-630 Use and management of containers.

(6) Inspections. At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion, deterioration, or other factors. **The owner or operator must keep an inspection log including at least the date and time of the inspection, the printed name and the handwritten signature of the inspector, a notation of the observations made and the date and nature of any repairs or remedial actions taken. The log must be kept at the facility for at least five years from the date of inspection.**

FROM: Paul W. Martin

DATE: 2/18/16

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