

<u>SUBJECT</u>		<u>DATE</u>
1056. PCB Reporting and Recordkeeping Relief	ENCORE	JAN 12, 2014
1057. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 16, 2014
1058. PCB Annual Records Retention Timeframes		JAN 31, 2014
1059. Satellite Accumulation within a ≤90-day Accumulation Area		FEB 7, 2014
1060. PCB Certificate of Disposal Relief	ENCORE	FEB 13, 2014
1061. Used Oil and Weekly Inspections		FEB 20, 2014
1062. Bags and RCRA Container Definition		FEB 27, 2014
1063. Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	MAR 6, 2014
1064. Spent Lead-Acid Batteries and Accumulation Time Limits		MAR 13, 2014
1065. Land Disposal Restrictions and Dates of Accumulation		MAR 23, 2014
1066. Universal Waste Accumulation Time Limits and the One Year Rule		MAR 29, 2014
1067. PCB Manifest Discrepancy Reports and Estimated Waste Weights		APR 6, 2014
1068. PCB Wastes, Independent Transporters and Confirmation of Receipt		APR 10, 2014
1069. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	APR 20, 2014
1070. Other Paint Wastes and the Applicability of the F001-F005 Listings	ENCORE	APR 24, 2014
1071. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents		MAY 1, 2014
1072. TSCA "No PCBs" versus "Non-PCBs" versus "Nondetectable PCBs"	ENCORE	MAY 8, 2014
1073. Purpose of Keeping a Hazardous Waste Container Closed	ENCORE	MAY 15, 2014
1074. PCB Containers and Multiple Removed From Service Dates		MAY 22, 2014
1075. Satellite Accumulation and RCRA Personnel Training		MAY 29, 2014
1076. Transporter Signatures on Hazardous Waste Manifest and Multiple Drivers		JUN 5, 2014
1077. Universal Waste and Nonhazardous Batteries		JUN 12, 2014
1078. Universal Waste and Incandescent Bulbs		JUN 19, 2014
1079. The PCB Mark and the Fields "Also Contact" and "Tel No"	ENCORE	JUN 29, 2014
1080. Halon Fire Extinguishers - Banned or Not Banned?	ENCORE	JUL 5, 2014
1081. Cabinets as RCRA Containers	ENCORE	JUL 13, 2014
1082. LDR Storage Prohibitions and Treated Wastes	ENCORE	JUL 17, 2014
1083. LDR Treatment Standards and F001 "Chlorinated Fluorocarbons"	ENCORE	JUL 24, 2014
1084. RCRA Regulatory Status of Chlorinated Fluorocarbons Used as Refrigerants	ENCORE	JUL 31, 2014
1085. Universal Wastes, Manifesting and DOT Shipping Names		AUG 7, 2014
1086. CERCLA Hazardous Substances – A Brief Definition		AUG 14, 2014
1087. CERCLA Hazardous Substances – The Petroleum Exclusion		AUG 21, 2014
1088. PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE	AUG 28, 2014
1089. Universal Waste and Basis for the One Year Accumulation Time Limit		SEP 4, 2014
1090. Product Spills and Waste Determinations	ENCORE	SEP 11, 2014
1091. PCB Concentrations and 10,000 PPM		SEP 18, 2014
1092. PCB Concentrations and 1,000 PPM		SEP 25, 2014
1093. Universal Waste Alkaline Batteries and Self-Transportation		OCT 2, 2014
1094. Universal Waste Lithium Batteries and Self-Transportation		OCT 9, 2014
1095. Universal Waste Batteries and Closed Containers	ENCORE	OCT 16, 2014
1096. PCB Containers and Concentration of PCBs		OCT 23, 2014
1097. Recyclable Chemicals and Zombie Destruction		OCT 31, 2014
1098. Satellite Accumulation Requirements in Washington State	ENCORE	NOV 6, 2014
1099. Satellite Accumulation and "At or Near"		NOV 13, 2014
1100. Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE	NOV 20, 2014
1101. Defining Criteria for Household Waste Exclusion	ENCORE	NOV 26, 2014
1102. The Household Waste Exclusion and Renovation Debris		DEC 4, 2014
1103. The Household Waste Exclusion and Renovation Debris – Part II		DEC 11, 2014
1104. PCB Ballasts and Disposal Options	ENCORE	DEC 18, 2014
1105. 'Twas the Night Before Christmas – The Twenty-Second Edition		DEC 24, 2014
1106. Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE	JAN 1, 2015
1107. Satellite Accumulation and Product Vessel Cleanouts		JAN 8, 2015
1108. Date of Accumulation for Hazardous Waste and Receipt of Analytical Information	ENCORE	JAN 15, 2015
1109. Conservative Declarations that Material is a Hazardous Waste		JAN 22, 2015
1110. Hazardous Waste Generator Tanks and the Date of Accumulation Marking	ENCORE	JAN 29, 2015
1111. Universal Waste, Satellite Accumulation and Centralized Collection Areas		FEB 4, 2015
1112. The PCB Mark and PCB Storage for Disposal Areas	ENCORE	FEB 12, 2015
1113. EPA Hazardous Waste Markings - Accumulation vs. Pre-Transport	ENCORE	FEB 19, 2015
1114. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	FEB 26, 2015
1115. Spent Lead-Acid Batteries and Secondary Containment		MAR 5, 2015
1116. The Mixtures Rule – Washington State vs. The Feds		MAR 12, 2015
1117. RCRA Permitted Storage and the Hazardous Waste Marking	ENCORE	MAR 19, 2015
1118. Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements	ENCORE	MAR 26, 2015

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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: AVAILABLE REGULATORY RELIEF FROM UNDERLYING HAZARDOUS CONSTITUENT (UHC) REQUIREMENTS

DATE: MARCH 24, 2015

<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 Ty Blackford 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 Roni Swan Michael Waters Jeff Widney	Brett Barnes Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver 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 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 Stamm Glen Triner Greg Varljen Julie Waddoups Kyle Webster Jeff Westcott Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements

Q: A RCRA trainer asked, "I should really know this but which regulations offer relief from determining if UHCs apply to D001 through D043 hazardous wastes?"

A: [40 CFR 268.9](#) basically states that if the generator determines that their waste displays a hazardous characteristic the generator must determine the underlying hazardous constituents (UHCs) in the characteristic waste. 40 CFR regulations that provide UHC relief include, but are not limited to:

- De minimis losses of characteristic wastes to wastewaters [268.1\(e\)\(4\)](#)
- Wastes sent to treaters who monitor for all UHCs [268.7\(a\)\(4\)](#)
- Wastes packaged as Non-appendix IV Lab Packs [268.7\(a\)\(9\)](#)
- D001 Low or High TOC treated by CMBST, RORGS or POLYM [268.9\(a\)](#)
- Wastes managed at Clean Water Act facilities [268.40\(e\)](#)
- Debris treated by the alternative treatment standards for Debris. [268.45](#)

[NOTE: This list is not meant to be all inclusive and other regulations may provide equal relief.]

SUMMARY:

- Regulations that provide relief from UHC requirements are:
 - De minimis losses of characteristic wastes to wastewaters
 - Treaters who monitor for all UHCs
 - Wastes managed at Clean Water Act facilities
 - D001 Low or High TOC treated via CMBST, RORGS, or POLYM
 - Non-Appendix IV lab packs
 - Alternative Treatment Standard for debris.

Pertinent regulations are 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: 3/26/15

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements

40 CFR 268.1 Purpose, scope and applicability

(e)(4) *De minimis* losses of characteristic wastes to wastewaters are not considered to be prohibited wastes and are defined as losses from normal material handling operations (e.g. spills from the unloading or transfer of materials from bins or other containers, leaks from pipes, valves or other devices used to transfer materials); minor leaks of process equipment, storage tanks or containers; leaks from well-maintained pump packings and seals; sample purgings; and relief device discharges; discharges from safety showers and rinsing and cleaning of personal safety equipment; rinsate from empty containers or from containers that are rendered empty by that rinsing; and laboratory wastes not exceeding one per cent of the total flow of wastewater into the facility's headworks on an annual basis, or with a combined annualized average concentration not exceeding one part per million in the headworks of the facility's wastewater treatment or pretreatment facility.

40 CFR 268.2 Definitions applicable in this part.

(i) *Underlying hazardous constituent* means any constituent listed in §268.48, Table UTS-Universal Treatment Standards, except fluoride, selenium, sulfides, vanadium, and zinc, which can reasonably be expected to be present at the point of generation of the hazardous waste at a concentration above the constituent-specific UTS treatment standards.

40 CFR 268.7 Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities.

(a)(4) Generator Paperwork Requirements Table

Required Information	§268.7 (a) (2)	§ 268.7 (a) (3)	§268.7 (a) (4)	§ 268.7 (a) (9)
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3. The waste is subject to the LDRs. The constituents of concern for F001-F005, and F039, and underlying hazardous constituents in characteristic wastes, unless the waste will be treated and monitored for all constituents. If all constituents will be treated and monitored, there is no need to put them all on the LDR notice.

40 CFR 268.7 Testing, tracking, and recordkeeping requirements for generators, treaters, and disposal facilities.

(a)(9) If a generator is managing a lab pack containing hazardous wastes and wishes to use the alternative treatment standard for lab packs found at §268.42(c):

(iii) If the lab pack contains characteristic hazardous wastes (D001-D043), underlying hazardous constituents (as defined in §268.2(i)) need not be determined.

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements

40 CFR 268.9 Special rules regarding wastes that exhibit a characteristic.

- (a) The initial generator of a solid waste must determine each EPA Hazardous Waste Number (waste code) applicable to the waste in order to determine the applicable treatment standards under subpart D of this part. This determination may be made concurrently with the hazardous waste determination required in §262.11 of this chapter. For purposes of part 268, the waste will carry the waste code for any applicable listed waste (40 CFR part 261, subpart D). In addition, where the waste exhibits a characteristic, the waste will carry one or more of the characteristic waste codes (40 CFR part 261, subpart C), except when the treatment standard for the listed waste operates in lieu of the treatment standard for the characteristic waste, as specified in paragraph (b) of this section. **If the generator determines that their waste displays a hazardous characteristic (and is not D001 nonwastewaters treated by CMBST, RORGS, OR POLYM of §268.42, Table 1), the generator must determine the underlying hazardous constituents (as defined at §268.2(i)) in the characteristic waste.**

40 CFR 268.40 Applicability of Treatment Standards

- (e) For characteristic wastes (D001-D043) that are subject to treatment standards in the following table “Treatment Standards for Hazardous Wastes,” **and are not managed in a wastewater treatment system that is regulated under the Clean Water Act (CWA), that is CWA-equivalent, or that is injected into a Class I nonhazardous deep injection well,** all underlying hazardous constituents (as defined in §268.2(i)) must meet Universal Treatment Standards, found in §268.48, Table Universal Treatment Standards, prior to land disposal as defined in §268.2(c) of this part.

40 CFR 268.45 Treatment standards for hazardous debris.

- (a) *Treatment standards.* Hazardous debris must be treated prior to land disposal as follows unless EPA determines under §261.3(f)(2) of this chapter that the debris is no longer contaminated with hazardous waste or the debris is treated to the waste-specific treatment standard provided in this subpart for the waste contaminating the debris:
- (1) **General.** Hazardous debris must be treated for each “contaminant subject to treatment” defined by paragraph (b) of this section using the technology or technologies identified in Table 1 of this section.
- (b) *Contaminants subject to treatment.* Hazardous debris must be treated for each “contaminant subject to treatment.” The contaminants subject to treatment must be determined as follows:
- (1) **Toxicity characteristic debris.** The contaminants subject to treatment for debris that exhibits the Toxicity Characteristic (TC) by §261.24 of this chapter are those EP constituents for which the debris exhibits the TC toxicity characteristic.

FROM: Paul W. Martin

DATE: 3/26/15

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