

| <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 – Accumulation vs. Pre-Transport | ENCORE | FEB 2, 2017 |
| 1214. | RCRA Empty Tanker Trailers and Listed Waste Codes | ENCORE | FEB 9, 2017 |
| 1215. | RCRA Empty vs. DOT Empty | ENCORE | FEB 16, 2017 |
| 1216. | RCRA Empty vs. DOT Empty II | ENCORE | FEB 23, 2017 |
| 1217. | Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents | ENCORE | MAR 2, 2017 |
| 1218. | Multiple Characteristic and Listed Hazardous Waste Codes and the "in lieu of" LDR Principle | ENCORE | MAR 9, 2017 |
| 1219. | LDR Storage Prohibitions and the One-Year Rule | ENCORE | MAR 16, 2017 |
| 1220. | LDR Storage Prohibitions and Treated Wastes | ENCORE | MAR 23, 2017 |
| 1221. | LDR Storage Prohibitions and Treated Hazardous Debris or Contaminated Soil | | MAR 30, 2017 |
| 1222. | LDR Requirements for Universal Wastes | | APR 6, 2017 |
| 1223. | LDR Requirements for Spent Lead-Acid Batteries Being Reclaimed | | APR 13, 2017 |
| 1224. | When is When Defined for the RCRA Phrase "When Reclaimed"? | ENCORE | APR 20, 2017 |
| 1225. | RCRA Characteristic of Ignitability and DOT Oxidizers | ENCORE | APR 27, 2017 |
| 1226. | Safety Data Sheets (SDSs) and Hazardous Wastes | ENCORE | MAY 4, 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: SAFETY DATA SHEETS (SDSS) AND HAZARDOUS WASTES

DATE: MAY 4, 2017

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TWO MINUTE TRAINING

SUBJECT: Safety Data Sheets (SDSs) and Hazardous Wastes

Q: A homeowner near a generic RCRA hazardous waste treatment, storage and disposal facility (TSDF) requests copies of safety data sheets (SDSs) for all the hazardous wastes managed at the facility. The TSDF Manager tells the homeowner that SDSs are not available since they are not required for hazardous wastes. The homeowner ponders, "Where is it documented that RCRA hazardous wastes are exempt from SDSs?"

A: Per OSHA 29 CFR 1910.1200(a), SDSs are part of a comprehensive hazard communication (HAZCOM) program that helps ensure communication of chemical hazards to employers and employees. Container labeling, other forms of warning, SDSs and employee training accomplish this communication.

RCRA hazardous wastes can be composed of various chemicals and could appear to be subject to SDSs; however, per 29 CFR 1910.1200(b)(6)(i), HAZCOM *"does not apply to:*

Any hazardous waste as such term is defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 U.S.C. 6901 et seq.), when subject to regulations issued under that Act by the Environmental Protection Agency."

Since RCRA hazardous wastes are not subject to 1910.1200 HAZCOM, those wastes are exempt from SDSs. This exemption makes sense since hazardous wastes may no longer resemble the original products from which they were generated. Note that even though a TSDF's hazardous waste is not subject to SDSs, any other chemicals that are not hazardous wastes (or do not meet any other exemptions from HAZCOM) could be subject to 29 CFR 1910.1200, Hazard Communications and therefore SDSs. Also note that in general, hazardous waste facilities can be subject to 29 CFR 1910.120, "Hazardous Waste Operations and Emergency Response" (HAZWOPER) which references HAZCOM requirements. However, 29 CFR 1910.120(p)(2) includes a NOTE stating, "The exemption for hazardous waste provided in §1910.1200 is applicable to this section". This reiterates that SDSs do not apply to hazardous waste.

SUMMARY:

- SDSs are part of a hazard communication program as outlined at 29 CFR 1910.1200.
- SDSs accomplish communication of chemical hazards to employees and employers.
- SDSs are not required for chemicals that meet the definition of RCRA hazardous wastes per the exemption documented at 29 CFR 1910.1200(b)(6)(i).

Nothing is attached. If you have any questions, contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

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DATE: 050417

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