

<u>SUBJECT</u>		<u>DATE</u>
1339. The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE	JUL 11, 2019
1340. Central Accumulation Areas and Signage Requirements		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 $\geq 50$ 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		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		SEP 26, 2019
1351. PCB Waste Regulation and April 18, 1978 vs. July 2, 1979		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		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		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		JAN 23, 2020
1368. The Hazardous Waste Manifest Instructions – Where did they go?		JAN 30, 2020
1369. The Mixtures Rule – Washington State vs. The Feds	ENCORE	FEB 6, 2020
1370. Used Oil and the Rebuttable Presumption		FEB 13, 2020
1371. Used Oil, Secondary Containment and Response to Spills	ENCORE	FEB 20, 2020
1372. Used Oil Eligibility for Animal and Vegetable Oils	ENCORE	FEB 27, 2020
1373. Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils	ENCORE	MAR 5, 2020
1374. Mercury Wet Cell Batteries - Debris or Not Debris?	ENCORE	MAR 12, 2020
1375. Hazardous Debris and Non-Radioactive Lead-Acid Batteries	ENCORE	MAR 19, 2020
1376. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris	ENCORE	MAR 26, 2020
1377. <b>MACRO</b> encapsulation vs. macroencapsulation	ENCORE	APR 2, 2020
1378. PCB Storage for Disposal and RCRA $\leq 90$ -Day Central Accumulation Areas	ENCORE	APR 9, 2020
1379. The PCB Mark and PCB Storage for Disposal Areas	ENCORE	APR 16, 2020
1380. PCB Containers and Multiple Removed From Service Dates	ENCORE	APR 23, 2020
1381. Contingency Plan Implementation and Small Spills of Hazardous Waste		APR 29, 2020
1382. Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation	ENCORE	MAY 7, 2020

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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:** SATELLITE ACCUMULATION AREAS AND THE THREE-DAY TIME LIMIT FOR EXCESS ACCUMULATION

**DATE:** MAY 7, 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 Barry Lawrence Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Linda Petersen Sean Sexton Dave Shea 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 Skogle 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

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## TWO MINUTE TRAINING

**SUBJECT:** Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation

**Q:** A customer has a 55-gallon container at a satellite accumulation area (SAA) near a new process line. The process generating the waste will fill an SAA container about every 5 days. The process is continuous and the customer is concerned that when the SAA container is full, the process will have to be shut down until the full SAA container is moved to the ≤90-day central accumulation area (CAA) or an interim status or permitted storage area (TSD). What is our customer to do?

**A:** Per [WAC 173-303-174\(1\)](#) [[40 CFR 262.15](#)], a generator may accumulate as much as 55 gallons of dangerous waste or 1 quart of liquid acutely hazardous wastes or 2.2 pounds of solid acutely hazardous waste in containers at or near any point of generation where wastes initially may accumulate. The SAA must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes. Compliance with permit or CAA requirements is not required provided the satellite container is – among other things:

- In good condition;
- Compatible with the waste;
- Kept closed except when adding or removing wastes;
- Marked as “Dangerous Waste” or “Hazardous Wastes”, and;
- Marked with the applicable hazard label(s) – e.g., Ignitable, Corrosive, Reactive and/or Toxic.

If the generator accumulates more than 55 gallons of dangerous waste or 1 quart/2.2 lbs., of acutely hazardous waste, the full SAA container holding the excess wastes must be marked with the date the excess amount began accumulating. Then the generator must move the full SAA container within 3 calendar days to a CAA or an onsite or offsite TSD.

In other words, if the customer fills a 55-gallon drum at an SAA with nonacutely dangerous waste, the SAA container must be marked with the accumulation start date when completely filled. Another SAA container may begin accumulating dangerous waste during the 3-day period that the full SAA container is awaiting transfer to the customer’s CAA or a TSD. Once the full drum arrives at the designated drum storage area, the waste is managed according to the applicable central accumulation or TSD storage area requirements. Note that in WA State, the CAA 90-day time limit begins when the SAA container is filled and not when the SAA container arrives at the CAA, like in most other States.

Therefore, the customer does not have to shut down the process pending removal of the full SAA container. The full SAA container would be dated and moved within three days to the customer’s designated central accumulation or an onsite or offsite TSD storage area. The generating process could continue to operate and begin accumulating dangerous/hazardous waste in the next SAA container. Technically, there is no container limit on how many SAA containers could be awaiting transfer to the designated accumulation or storage area, as long as the generator transfers the SAA containers within their respective 3-day time limits.

### SUMMARY:

- An SAA can accumulate up to 55-gallons dangerous waste or 1 quart/2.2 lbs., of acutely hazardous wastes.
- Once the SAA limit is exceeded, the generator must date the full SAA container and within 3 days transfer the full SAA container to the designated central accumulation or TSD storage area.
- A new SAA container may accumulate wastes during the 3-day period the full SAA drum is awaiting transfer.

Excerpts from WAC 173-303-174(1) and [WAC 173-303-200\(2\)\(b\)](#) [*No 40 CFR equivalent*] are attached to the e-mail. If you have any questions, please contact me at [Paul\\_W\\_Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 5/7/2020

**FILE:** 2MT\2020\050720.rtf

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation

**WAC 173-303-174**      **Satellite accumulation area regulations for medium quantity generators and large quantity generators.**

(1) A generator may accumulate as much as fifty-five gallons of dangerous waste or either one quart of liquid acutely hazardous waste or 2.2 lbs. of solid acutely hazardous waste (as defined in WAC 173-303-040) in containers at or near any point of generation where waste initially accumulates (defined as a satellite accumulation area in WAC 173-303-040). The satellite accumulation area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes to a satellite container. A generator may accumulate waste without a permit, or without complying with WAC 173-303-400, 173-303-600, 173-303-692, and 173-303-800, provided that all the conditions for exemption in this section are met. A generator may comply with the conditions for exemption in this section instead of complying with the conditions for exemption in WAC 173-303-172 and 173-303-200, except as required by (h) and (i) of this subsection. The conditions for exemption for satellite accumulation are:

(a) Condition of containers. If a container holding dangerous waste is not in good condition (e.g., severe corroding or rusting or flaking or scaling, and/or apparent structural defects) or if it begins to leak, the generator must transfer the dangerous waste to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area operated in compliance with WAC 173-303-172 or 173-303-200, as applicable. In addition, the owner or operator must address leaks and spills in accordance with the applicable provisions of WAC 173-303-145 and 173-303-360.

(b) Compatibility of waste with containers. The generator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the dangerous waste to be stored, so that the ability of the container to contain the waste is not impaired.

(c) Management of containers.

(i) A container holding dangerous waste must be closed at all times, except:

(A) When it is necessary to add or remove waste; or

(B) When temporary venting of a container is necessary, such as:

(I) For the proper operation of equipment; or

(II) To prevent dangerous situations, such as build-up of extreme pressure.

(ii) A container holding dangerous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

(d) Special requirements for ignitable or reactive waste. Containers holding reactive waste exhibiting a characteristic specified in WAC 173-303-090 (7)(a)(vi) through (viii) must be stored in a manner equivalent to the separation distances for storage of explosives in the International Fire Code, 2015 edition, or the version adopted by the local fire district.

(e) Special requirements for incompatible wastes.

(i) Incompatible wastes, or incompatible wastes and materials must not be placed in the same container, unless WAC 173-303-395 (1)(b) is complied with.

(ii) Dangerous waste must not be placed in an unwashed container that previously held an incompatible waste or material.

## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation

(iii) A storage container holding a dangerous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device. Containment systems for incompatible wastes must be separate.

(f) Container labeling or marking. A generator must clearly label or mark each container of dangerous waste with the following:

(i) The words "Dangerous Waste" or "Hazardous Waste." Except for containers one gallon (or four liters) and under, the lettering must be legible from a distance of twenty-five feet or the lettering size is a minimum of one-half inch in height.

(ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable dangerous waste characteristic(s) and criteria of ignitable, corrosive, reactive and toxic and the applicable hazard(s) identified for listed dangerous wastes). The label or marking must be:

(A) Legible and/or recognizable from a distance of twenty-five feet or the lettering size is a minimum of one-half inch in height; and

(B) Include descriptive word(s) and/or pictogram(s) that identifies the hazards associated with the contents of the containers for the public, emergency response personnel, and employees; for containers one gallon (or four liters) and under the label, marking or lettering can be appropriate for the size of the container.

(g) Accumulation limits. When the accumulation limits listed in this subsection are met:

(i) The container(s) must be marked immediately with the accumulation start date; and

(ii) Moved within three consecutive calendar days to a permitted on-site designated storage area or an on-site central accumulation area or to a permitted off-site designated facility; and

(iii) During the three consecutive calendar day period the generator must continue to comply with all the conditions for exemption for satellite accumulation in this section.

(h) All satellite accumulation areas operated by medium quantity generators must meet the preparedness and prevention regulations and the emergency procedures in WAC 173-303-172.

(i) All satellite accumulation areas operated by large quantity generators must meet the preparedness, prevention and contingency regulations and emergency procedures in WAC 173-303-201.

**WAC 173-303-200**      **Conditions for exemption for a large quantity generator that accumulates dangerous waste.**

(2) Accumulation time limit.

(b) For the purposes of this section, the ninety-day accumulation period begins on the date that:

(iii) The generator exceeds its satellite accumulation limits prescribed in WAC 173-303-174(1).