

<u>SUBJECT</u>		<u>DATE</u>
1253. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1254. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1255. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1256. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1257. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1258. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1259. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017
1260. Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 4, 2018
1261. Conservative Declaration that Material is a Hazardous Waste	ENCORE	JAN 11, 2018
1262. Defining Criteria for Household Waste Exclusion	ENCORE	JAN 18, 2018
1263. The Household Waste Exclusion and Renovation Debris	ENCORE	JAN 25, 2018
1264. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	FEB 1, 2018
1265. The Mixtures Rule – Washington State vs. The Feds	ENCORE	FEB 8, 2018
1266. Spent Lead-Acid Batteries and Secondary Containment	ENCORE	FEB 15, 2018
1267. Spent Lead-Acid Batteries and Accumulation Time Limits	ENCORE	FEB 23, 2018
1268. CERCLA Hazardous Substances – A Brief Definition	ENCORE	MAR 1, 2018
1269. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris	ENCORE	MAR 8, 2018
1270. RCRA Treatment and the Two-Part Definition	ENCORE	MAR 15, 2018
1271. Who Wants to be a Generator!!!	ENCORE	MAR 22, 2018
1272. Who Wants to be a Generator Part 2!!!	ENCORE	MAR 29, 2018
1273. "No Smoking" Signs and Tobacco-Free Facilities		APR 5, 2018
1274. Aqueous Solutions and the Characteristic of Corrosivity	ENCORE	APR 12, 2018
1275. Aqueous Solutions and the Characteristic of Ignitability	ENCORE	APR 19, 2018
1276. PCB Bulk Product Wastes and the One Year Disposal Requirement	ENCORE	APR 26, 2018
1277. PCB Radioactive Wastes and Exception Reporting	ENCORE	MAY 3, 2018
1278. TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date	ENCORE	MAY 10, 2018
1279. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	MAY 17, 2018
1280. Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation		MAY 24, 2018
1281. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit	ENCORE	MAY 31, 2018

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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 OF AEROSOL CANS AND DETERMINING THE 55-GALLON LIMIT

**DATE:** MAY 31, 2018

<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 John Dent Lorna Dittmer Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Sasa Kosjerina Jim Leary Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg 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 Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit

**Q:** A customer has started accumulating empty and non-working, partially full aerosol paint containers in a large 100-gallon tote that is being managed as a RCRA satellite accumulation area (SAA). As the aerosol cans accumulate, the customer is not sure how to determine when the 55-gallon limit is being approached. For these aerosol cans, should the SAA 55-gallon limit be determined based upon the accumulation of 55 gallons of aerosol cans (roughly a half-full 100-gallon tote), or based upon the accumulation of 55 gallons of the residues within the aerosol cans?

**A:** According to [WAC 173-303-200\(2\)\(a\)](#) [[40 CFR 262.34\(c\)](#) or [40 CFR 262.15\\*](#)], a generator may accumulate as much as 55 gallons of dangerous/hazardous waste or one quart of acutely hazardous waste in containers at or near any point of generation where waste initially accumulates. The regulation does not give any details on how the 55-gallon or 1 quart limit is determined.

However, an EPA guidance letter dated February 17, 2016, ([RO 14875](#)) concerning satellite accumulation of containers with acutely hazardous waste residues stated:

*“... the residues remaining in containers that held commercial chemical products are hazardous wastes, and EPA has clarified on several occasions that a distinction may be drawn between the residues themselves and the container...”*

*Accordingly, the same principle would apply here, and the one-quart accumulation limitation in an SAA only applies to acute hazardous waste and any residues within the container. In your circumstances, the container itself does not need to be included when calculating the maximum accumulation volume of acute hazardous waste in an SAA.”*

Applying this acutely hazardous waste residue analogy to non-acutely hazardous waste aerosol cans with residues means the customer can calculate the residues remaining in the empty and partially full aerosol cans to determine when the 55-gallon limit is being approached. The customer could take a conservative approach and accumulate the aerosol cans in a 55-gallon container and when full of cans, assume the 55-gallon limit has been reached even though there may only be a few gallons of actual hazardous waste residues. On the other hand, the customer could make defensible estimates or assumptions of how much residue remains in the aerosol cans as they are accumulated. With this option, the customer might be able to fill the 100-gallon tote to capacity and still not exceed the 55-gallon limit.

Therefore the 55-gallon limit for these aerosol cans can be based on the volume of residues remaining in the aerosol cans as opposed to the aerosol cans themselves.

### SUMMARY:

- SAAs are limited to 55 gallons of hazardous/dangerous wastes or 1 quart of acutely hazardous waste.
- The SAA limit could conservatively be based on the volume of the aerosol container themselves.
- The SAA limit could also be based only on the volume of the residues remaining within the aerosol cans.

WAC 173-303-200(2) and the February 17, 2016, EPA guidance letter 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:** 5/31/18

**FILE:** 2MT\2018\053118.rtf

**PG:** 1

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit

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

(2) Satellite accumulation.

(a) A generator may accumulate as much as fifty-five gallons of dangerous waste or one quart of 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 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. Satellite accumulation is allowed without a permit provided the generator:

(i) Complies with [WAC 173-303-630](#)(2), (4), (5)(a) and (b), (8)(a), and (9)(a) and (b); and

(ii) Complies with subsection (1)(d) of this section.

(b) When fifty-five gallons of dangerous waste or one quart of acutely hazardous waste (as defined in WAC 173-303-040) is accumulated, the container(s) must be marked immediately with the accumulation date and moved within three days to a designated storage or accumulation area.

(c) On a case-by-case basis the department may require the satellite area to be managed in accordance with all or some of the requirements under subsection (1) of this section, if the nature of the wastes being accumulated, a history of spills or releases from accumulated containers, or other factors are determined by the department to be a threat or potential threat to human health or the environment.

\* 40 CFR 262.15, "Satellite accumulation area regulations for small and large quantity generators" is from the Hazardous Waste Generator Improvements Final Rule and may not yet be effective in all states and is not yet effective in Washington state.