

<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
1227. Containers and Tanks – RCRA Wastes vs. TSCA PCB Wastes	ENCORE	MAY 11, 2017
1228. Universal Waste Lamps and Prohibition on Crushing	ENCORE	MAY 18, 2017
1229. Operating Record vs. Operating Log		MAY 25, 2017
1230. Operating Records Not Referenced in "Facility Recordkeeping"		JUN 1, 2017
1231. Used Oil and Weekly Inspections	ENCORE	JUN 8, 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:** USED OIL AND WEEKLY INSPECTIONS

**DATE:** JUNE 8, 2017

<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 Roni Ashley Tania Bates 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 Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Ron Brunke Bob Bullock Bill Cox Laura Cusack Lorna Dittmer Ted Hopkins Sasa Kosjerina Jim Leary Rick Oldham Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple 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 Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz 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 Marty 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 Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** Used Oil and Weekly Inspections

**Q:** A customer understands the basic container requirements for a used oil generator, i.e., used oil containers must be closed except when adding or removing used oil; in good condition; and marked “Used Oil”, but the customer does not understand why daily or weekly inspections are not required. So what’s up with that?

**A:** Per the [September 10, 1992, Federal Register](#) on page 41587 it states:

*“Inspection requirements. In the 1985 and 1991 proposals, EPA proposed daily inspection requirements for used oil generators to assure the discovery of used oil spills and releases at used oil generator facilities, commenters opposed the proposed daily inspection requirements. Most of these commenters claimed that when generators are loading/transferring used oils, they check for leaks and spills and take appropriate action at that the time to clean up the released oil and contaminated materials. Transferring operations do not occur daily at generator sites. SPCC [Spill Prevention Control and Counter-Measures Plan] inspection and clean up requirements will be applicable independently.”*

And in case the above wording it is not clear, in the September 10, 1992, Federal Register on page 41584, “Table VI.2 – Used Oil” identifies used oil generator requirements and whether the requirements are new or existing. On the line item for “Inspection requirements” the determination of new or existing is marked as “NA” or not applicable. Therefore, container inspections of used oil containers are not required.

### SUMMARY:

- Used oil generator requirements for containers are basically that the containers be closed, in good condition and marked as “used oil”.
- EPA proposed daily inspection requirements for used oil but commenters were opposed.
- Due to comments that used oil containers are routinely checked during loading and transferring, EPA did not require inspections by used oil generators.

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.

**FROM:** Paul W. Martin

**DATE:** 6/8/17

**FILE:** 2MT\2017\060817.rtf

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