

<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 ≥ 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. MACRO encapsulation vs. macroencapsulation	ENCORE	APR 2, 2020
1378. PCB Storage for Disposal and RCRA ≤ 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
1383. The RCRA Definition of “Regulated Unit”		MAY 14, 2020
1384. RCRA and New Point of Generation		MAY 21, 2020
1385. The Alcohol Exclusion for Ignitable Hazardous Wastes	ENCORE	MAY 28, 2020
1386. PCB Certificates of Disposal and Manifesting Between Related Facilities	ENCORE	JUN 4, 2020
1387. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario I	ENCORE	JUN 11, 2020
1388. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	JUN 18, 2020
1389. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	JUN 25, 2020
1390. Aqueous Solutions and the Characteristic of Corrosivity	ENCORE	JUL 2, 2020
1391. Satellite Accumulation Containers and the Date of Accumulation Marking	ENCORE	JUL 9, 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 CONTAINERS AND THE DATE OF ACCUMULATION MARKING

DATE: JULY 9, 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 Skogleie 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 Containers and the Date of Accumulation Marking

Q: A generator has a satellite accumulation area (SAA) container that is only half-full and has not exceeded the 55-gallon limit for dangerous wastes; however, the generator wants to move the SAA container to an onsite Central Accumulation Area (CAA), i.e., a ≤ 90 -day area. The generator is aware that once 55 gallons of hazardous waste is exceeded i.e., the 55-gallon container is full; the SAA must be marked with the date of accumulation and moved within 3 days to a designated storage or accumulation area. If the generator wants to move the SAA to an onsite CAA before 55 gallons of dangerous waste or 1 quart/kilogram of acutely hazardous waste is accumulated, must the SAA still be marked with a date of accumulation?

A: Per [WAC 173-303-174\(1\)\(g\)](#), [[40 CFR 262.15\(a\)\(6\)](#)]:

“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.*

Based on the above regulation it appears that if waste has not met the accumulation limits by exceeding 55 gallons of dangerous waste, (or 1 quart/kilogram for acutely hazardous waste), the date of accumulation marking is not required. As further clarification, a Washington Department of Ecology Technical Information Memorandum (TIM) revised February 2010, ([Publication 19-04-029](#)) states:

“Once you accumulate 55 gallons of dangerous waste or one quart (2.2 pounds) of acutely hazardous waste in a container, immediately mark it with the accumulation start date. Within three calendar days you must move all waste in the SAA to a CAA or send to a permitted Treatment, Storage, and Disposal (TSD) facility.”

Since the accumulation threshold has not been met, the generator’s SAA container does not require a date of accumulation in terms of the 3-day rule. Note that once the SAA arrived at the CAA, the former SAA container would be marked with a date of accumulation to comply with the ≤ 90 -day requirements. If the SAA arrived at a permitted/ interim status storage facility, the former SAA would be marked with a date of accumulation to comply with the Land Disposal Restriction requirements and the prohibitions on storage.

SUMMARY:

- SAs must be marked with a date of accumulation once 55 gallons of dangerous waste or 1 quart/kilogram of acutely hazardous waste is accumulated.
- The date of accumulation is only required once the SAA volume thresholds are exceeded.
- If the generator wants to move an SAA before 55 gallons of dangerous waste or 1 quart/kilogram of acutely hazardous waste is accumulated, the 3-day date of accumulation marking is not required.

Nothing is 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: 7/9/2020

FILE: 2MT\2020\070920.rtf

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