

<u>SUBJECT</u>		<u>DATE</u>
1320. Treated Hazardous Waste Used as Dust Suppressant		FEB 28, 2019
1321. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	MAR 7, 2019
1322. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAR 14, 2019
1323. Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAR 21, 2019
1324. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAR 28, 2019
1325. PCB Decontamination Standard with No Decontamination Performed	ENCORE	APR 4, 2019
1326. PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE	APR 11, 2019
1327. PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE	APR 18, 2019
1328. PCB Concentrations and Micrograms per Centimeters Squared (µg/cm ²)	ENCORE	APR 25, 2019
1329. Operating Record vs. Operating Log	ENCORE	MAY 2, 2019
1330. Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE	MAY 9, 2019
1331. Washington State Used Oil and Mixtures with Other Materials	ENCORE	MAY 16, 2019
1332. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	MAY 23, 2019
1333. Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE	MAY 30, 2019
1334. Universal Waste Alkaline Batteries and Self-Transportation	ENCORE	JUN 6, 2019
1335. Universal Waste Lithium Batteries and Self-Transportation	ENCORE	JUN 13, 2019
1336. RCRA Hazard Labeling – A Random Scenario		JUN 20, 2019
1337. Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE	JUN 27, 2019
1338. Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE	JUL 3, 2019
1339. The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE	JUL 11, 2019
1340. Central Accumulation Areas and Signage Requirements		JUL 18, 2019

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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: CENTRAL ACCUMULATION AREAS AND SIGNAGE REQUIREMENTS

DATE: JULY 18, 2019

<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 Eric Erpenbeck 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 Bill Cox Noah Cruz Jeanne Elkins Jonathan Fullmer Ted Hopkins Tad Karschnia Barry Lawrence Jim Leary Diane Leist Mitch Marrott Stewart McMahan Brian Mitcheltree Anthony Nagel Linda Petersen Fred Ruck Sean Sexton Dave Shea Ray Swenson 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 Skoglie 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 Tom Gilmore Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho 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: Central Accumulation Areas and Signage Requirements

Q: A customer in Washington state is designing a central accumulation area (CAA - formerly known as a ≤ 90 -day accumulation area) for ignitable and reactive dangerous wastes. The customer wants to post signs stating “Central Accumulation Area”, “Danger - Unauthorized Personnel Keep Out” and “No Smoking”. For a CAA, which signs are required and which signs, if any, are optional?

A: Per WAC 173-303-200(3)(f)(iii) [40 CFR 262.17], it basically states that a generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes. One of those precautions is for the generator to post conspicuously, “No Smoking” signs wherever there is a hazard from ignitable or reactive wastes.

Concerning “Danger – Unauthorized Personnel Keep Out” signs, per WAC 173-303-200(7)(c), the Washington Department of Ecology “may also require” that danger signs or an equivalent legend, be posted at each entrance to the CAA. Since the regulation states that the department may require signs to be posted, the danger sign is not a requirement unless the department specifies the posting.

A review of 40 CFR 262 revealed no parallel requirement at the Federal level for “Danger – Unauthorized Personnel Keep Out” signs. Also, there was no Washington state or Federal requirement to post a “Central Accumulation Area” sign.

Therefore, the customer would be required to post the “No Smoking” sign. The danger sign may be required in Washington State but would not be required at the Federal level. The CAA sign would also not be required. Note that the generator could post both the danger and CAA signs as best management practices since regulations do not prohibit additional signs.

SUMMARY:

- “No Smoking” signs are required at CAAs accumulating ignitable or reactive wastes.
- “Danger – Unauthorized Personnel Keep Out” maybe be required at CAAs in Washington state and are not required at the Federal level.
- “Central Accumulation Area” signs are not required, but can be a best management practice.

WAC 173-303-200(3), 40 CFR 262.17 and WAC 173-303-200(7) are 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: 7/18/19

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Central Accumulation Areas and Signage Requirements

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

Large quantity generators, not to include transporters as referenced in WAC 173-303-240(3), may accumulate dangerous waste on site without a permit or interim status, and without complying with the requirements of WAC 173-303-600 provided that all of the following conditions for exemption listed in this section are met.

(3) Accumulation of waste in containers.

(f) Special requirements for ignitable or reactive waste.

(iii) The generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including, but not limited to, the following: Frictional heat, sparks (static, electrical, or mechanical), and radiant heat. While ignitable or reactive waste is being handled, the generator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

(7) Labeling and marking of containers and tanks.

(c) The department may also require that a sign be posted at each entrance to the accumulation area, bearing the legend, "danger - unauthorized personnel keep out," or an equivalent legend, written in English, and legible from a distance twenty-five feet or more.

40 CFR §262.17 Conditions for exemption for a large quantity generator that accumulates hazardous waste

A large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, or the notification requirements of section 3010 of RCRA, provided that all of the following conditions for exemption are met:

(a) *Accumulation.* A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section. The following accumulation conditions also apply:

(1) *Accumulation of hazardous waste in containers.* If the hazardous waste is placed in containers, the large quantity generator must comply with the following:

(vi) *Special conditions for accumulation of ignitable and reactive wastes.*

(B) The large quantity generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (*e.g.*, from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.

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DATE: 7/18/19

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