

| <u>SUBJECT</u> | | <u>DATE</u> | |
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| 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 |
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| 1238. | Office Waste Management | ENCORE | JUL 27, 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: RCRA EPA IDENTIFICATION NUMBERS – SITE SPECIFICS

DATE: AUGUST 3, 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: RCRA EPA Identification Numbers – Site Specifics

Q: A customer has two facilities in a large metropolitan city. The customer at the larger northern facility wants to have dangerous/hazardous waste picked up at the smaller southern facility using the northern facility's EPA Identification Number. The southern facility is not a WA small quantity generator or a Federal conditionally exempt small quantity generator, i.e., the southern facility is required to have an EPA ID#. The two facilities are also separated by several miles. Can the northern facility's EPA ID# be used to manifest the southern facility's dangerous waste?

A: Per [WAC 173-303-040](#), Definitions, [[40 CFR 260.10](#)], a “generator” means any person, by site, whose act or process produces dangerous waste or whose act first causes a dangerous waste to become subject to regulation. The southern facility's processes generated the dangerous waste and therefore the southern facility is the generator. Also the term “on-site” means the same or geographically contiguous property. Since the customer's two sites are separated by several miles and are not contiguous, the two facilities cannot be considered the same site.

As further clarification, in a letter dated August 15, 1989, from EPA to the Kansas City International Airport ([RO 11456](#)), EPA stated:

“Generators and transporters of hazardous waste must obtain an EPA identification number from the EPA Administrator before they treat, store, dispose of, transport, or offer for transportation, hazardous waste. The numbers are obtained by submitting a notification form, EPA Form 8700-12, to the Administrator. The numbers are issued to each generator on a by-site basis. Therefore if (your company) has facilities in various locations, each facility, by site, must have an EPA ID number.”

Since the customer's two facilities are not considered the same site, a separate EPA ID# is required for the northern and southern facilities. Therefore, the southern facility must use its own EPA ID# to manifest its dangerous waste and cannot use the northern facility's EPA ID#.

SUMMARY:

- A generator is defined on a by-site basis.
- A site is defined as the same contiguous property.
- If a generator has facilities at multiple sites that are not contiguous, each site must have a separate EPA ID number.

Excerpts from WAC 173-303-040, 40 CFR 260.10, and the August 15, 1989 EPA letter are attached. 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: 8/3/17

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TWO MINUTE TRAINING – ATTACHMENT

WAC 173-303-040 Definitions.

When used in this chapter, the following terms have the meanings given below.

"Generator" means any person, by site, whose act or process produces dangerous waste or whose act first causes a dangerous waste to become subject to regulation.

"On-site" means the same or geographically contiguous property which may be divided by public or private right of way, provided that the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along the right of way. Noncontiguous properties owned by the same person but connected by a right of way which they control and to which the public does not have access, are also considered on-site property.

40 CFR §260.10 Definitions

When used in parts 260 through 273 of this chapter, the following terms have the meanings given below:

Generator means any person, by site, whose act or process produces hazardous waste identified or listed in part 261 of this chapter or whose act first causes a hazardous waste to become subject to regulation.

On-site means the same or geographically contiguous property which may be divided by public or private right-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along, the right-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way which he controls and to which the public does not have access, is also considered on-site property.

TWO MINUTE TRAINING – ATTACHMENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUGUST 15, 1989

William L. Bider
Manager - Environmental Protection
Trans World Airlines, Inc.
P.O. Box 20126
Kansas City International Airport
Kansas City, Missouri 64195

Dear Mr. Bider:

This letter is in response to your letter of July 18, 1989. You ask if TWA's St. Louis Airport facility requires one or more EPA Identification numbers. The determination in this case must be made by State and EPA Region personnel. However, we can provide you with a general description of the relationship between the EPA ID number and a facility location, or "site" requiring such a number.

Generators and transporters of hazardous waste must obtain an EPA identification number from the EPA Administrator before they treat, store, dispose of, transport, or offer for transportation, hazardous waste (40 CFR Section 262.12). The numbers are obtained by submitting a notification form, EPA form 8700-12, to the Administrator. The numbers are issued to each generator on a by-site basis. Therefore, if TWA has facilities in various locations, each facility, by site, must have an EPA ID number.

The definition of "on-site" as referenced by you in your letter and as found in 40 CFR 260.10, may be helpful in determining if TWA's St. Louis Airport facility constitutes one or more "sites." "On-Site" means the same or geographically contiguous property which may be divided by public or private right-of-way . . ." From your description it appears that all of your airport facilities are on a single property. It is unclear, however, whether there are any rights-of way to which the public has access. If there are, the entrance and exit between the properties must be at a cross-roads intersection, i.e. vehicles by not carry unmanifested waste along the public right-of-way. The information you gave us thus seems to show that under EPA's regulations you would only need one identification number. However, as stated previously, the State is the appropriate authority for making this determination. Also, you should be aware that State regulations may dictate a different result.

If you have any further questions in regard to this letter, you may contact Emily Roth of my staff at (202) 382-4777.

Sincerely,

Devereaux Barnes, Director
Characterization & Assessment Division
Office of Solid Waste

FaxBack # 11456

FROM: Paul W. Martin

DATE: 8/3/17

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