

| <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 |
| 1282. Universal Waste and Basis for the One Year Accumulation Time Limit | ENCORE | JUN 7, 2018 |
| 1283. F001 Degreaser versus F002 Solvent | ENCORE | JUN 14, 2018 |
| 1284. Hazardous Waste Determinations and Phase Separation | ENCORE | JUN 20, 2018 |
| 1285. PCB Certificates of Disposal and Manifesting Between Related Facilities | | JUN 28, 2018 |
| 1286. PCB Concentrations and 10,000 PPM | ENCORE | JUL 5, 2018 |
| 1287. PCB Concentrations and 1,000 PPM | ENCORE | JUL 12, 2018 |
| 1288. Satellite Accumulation Containers and the Date of Accumulation Marking | | JUL 19, 2018 |
| 1289. Satellite Accumulation Requirements in Washington State | ENCORE | JUL 26, 2018 |
| 1290. Satellite Accumulation Areas and Under the Control of the Operator | | AUG 2, 2018 |
| 1291. Exceptions to Free Liquids in Landfills Prohibition | ENCORE | AUG 9, 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: EXCEPTIONS TO FREE LIQUIDS IN LANDFILLS PROHIBITION

DATE: AUGUST 9, 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> |
|--|--|---|---|---|--|
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TWO MINUTE TRAINING

SUBJECT: Exceptions to Free Liquids in Landfills Prohibition

Q: A customer understands that disposal of containerized liquids is prohibited in hazardous and dangerous waste landfills. However, the customer wants to know if there are exceptions for containers with free liquids to be placed in a landfill, and if there is a test method for determining if a waste contains free liquids?

A: Per WAC 173-303-140(4)(b)(ii), [40 CFR 264.314(c)] containers holding free liquids must not be placed in a landfill unless all free-standing liquid has been:

- removed by decanting, or other methods
- mixed with sorbent or stabilized (solidified) so that no free-standing liquid is observed; or
- otherwise eliminated.

Exceptions to free liquids in landfills include:

- very small containers, such as ampules; or
- containers designed to hold free liquids for use other than storage, such as batteries or capacitors; or
- labpacks disposed of in accordance with WAC 173-303-161 [40 CFR 264.316].

To demonstrate the absence or presence of free liquids in either a containerized or a bulk waste, SW-846 Test Method 9095 (Paint Filter Liquids Test) must be used. Basically a small amount of material is placed in a paint filter (a paper cone) and if any portion of the material passes through and drops from the filter within the 5-minute test period, the material is deemed to contain free liquids.

SUMMARY:

- Containers holding free liquids must not be placed in a landfill unless all free-standing liquid is removed, mixed with sorbent, or eliminated.
- Exceptions to the free liquids prohibition include ampules, batteries, and lab packs.
- The Paint Filter Liquids Test is used to determine the absence or presence of free liquids.

WAC 173-303-140(b) is attached to the e-mail. 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: 8/9/18

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Exceptions to Free Liquids in Landfills Prohibition

WAC 173-303-140 Land disposal restrictions. Check if reg is current.

(4) Land disposal restrictions and prohibitions. The land disposal requirements of this subsection apply to land disposal in Washington state.

(b) Disposal of liquid waste. Special requirements for bulk and containerized liquids.

(i) The placement of bulk or noncontainerized liquid dangerous waste or dangerous waste containing free liquids (whether or not sorbents have been added) in any landfill is prohibited.

(ii) Containers holding free liquids must not be placed in a landfill unless:

(A) All free-standing liquid:

(I) Has been removed by decanting, or other methods; or

(II) Has been mixed with sorbent or stabilized (solidified) so that free-standing liquid is no longer observed; or

(III) Has been otherwise eliminated; or

(B) The container is very small, such as an ampule; or

(C) The container is designed to hold free liquids for use other than storage, such as a battery or capacitor; or

(D) The container is a labpack and is disposed of in accordance with WAC 173-303-161 and this chapter.

(iii) To demonstrate the absence or presence of free liquids in either a containerized or a bulk waste, the following tests must be used: **Method 9095 (Paint Filter Liquids Test)** as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods" EPA Publication SW-846 as incorporated by reference in WAC 173-303-110 (3)(a).

(iv) Sorbents used to treat free liquids to be disposed of in landfills must be nonbiodegradable. Nonbiodegradable sorbents are: Materials listed or described in (b)(iv)(A) of this subsection; materials that pass one of the tests in (b)(iv)(B) of this subsection; or materials that are determined by the department to be nonbiodegradable through WAC 173-303-910.

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