

<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
1292. Ampules and the Exception to Free Liquid in Landfills Prohibition		AUG 16, 2018
1293. Overpacks vs. Salvage Drums	ENCORE	AUG 23, 2018
1294. Universal Wastes - Recycling versus Disposal	ENCORE	AUG 30, 2018
1295. Universal Waste One Year Accumulation and Multiple Handlers	ENCORE	SEP 6, 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: UNIVERSAL WASTE ONE YEAR ACCUMULATION AND MULTIPLE HANDLERS

DATE: SEPTEMBER 6, 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>
Richard Austin Tania Bates Rene Catlow Richard Clinton Larry Cole John Dent Lorna Dittmer Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Jim Leary Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg 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 Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills 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: Universal Waste One Year Accumulation and Multiple Handlers

Q: A customer accumulates universal waste (UW) and is aware of the one-year accumulation time limit referenced at [WAC 173-303-573\(22\)](#), [[40 CFR 273.35](#)], “Accumulation time limits”. However, the customer is unsure if the one-year time limit for UW is a total of one year – like PCB wastes - or if the one-year “clock” restarts for the next UW handler. So when the customer ships the UW to the next UW handler or UW destination facility, how long can the next facility accumulate the UW?

A: Per WAC 173-303-573(11)(a) [Small Handler of UW] and (22)(a) [Large Handler of UW], a handler of UW may accumulate UW for no longer than one year from the date the UW is generated, or received from another handler, unless the requirements of (b) of this subsection are met. Paragraph (b) states that UW may be accumulated for more than one year if more time is needed to facilitate proper recovery, treatment or disposal. Paragraph (b) goes on to state that the handler bears the burden of proving that more time is needed solely for proper recovery, treatment or disposal. This is the same concept used for the land disposal restrictions if more than one year of storage for hazardous waste is needed.

Concerning accumulation at a subsequent handler, semi-hidden in paragraph (a) is wording indicating that subsequent handlers have their own one year of accumulation. Per the wording that a handler may accumulate UW for no longer than one year from the date the UW is generated or “received from another handler” implies that another year of accumulation is allowed.

As further clarification and confirmation, an EPA letter dated March 1, 1998, ([RO 14179](#)) stated:

“When universal waste is transferred and accumulated by multiple handlers, each individual handler may utilize the one-year accumulation provisions of §§273.15 and 273.35, since each location at which universal wastes are consolidated and/or collected is regulated as a separate handler.”

Therefore the next subsequent UW handlers of the customer’s UW can also accumulate UW for up to one year.

SUMMARY:

- In general, UW may be accumulated for no longer than one year from the date of generation or receipt from another UW handler.
- UW may be accumulated for more than one year to facilitate proper recovery, treatment or disposal.
- According to EPA, since each subsequent handler of UW is regulated as a separate handler, each subsequent handler of UW also has up to one year of accumulation.

WAC 173-303-573(22) and the March 1, 1998 EPA letter are attached to the e-mail. 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: 9/6/18

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Universal Waste One Year Accumulation and Multiple Handlers

WAC 173-303-573 Standards for universal waste management.

(22) Accumulation time limits.

(a) A large quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler, unless the requirements of (b) of this subsection are met.

(b) A large quantity handler of universal waste may accumulate universal waste for longer than one year from the date the universal waste is generated, or received from another handler, if such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. However, the handler bears the burden of proving that such activity was solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal.

(c) A large quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

(i) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;

(ii) Marking or labeling the individual item of universal waste (for example, each battery, thermostat, mercury-containing equipment, or lamp) with the date it became a waste or was received;

(iii) Maintaining an inventory system on site that identifies the date the universal waste being accumulated became a waste or was received;

(iv) Maintaining an inventory system on site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers of universal waste became a waste or was received;

(v) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received; or

(vi) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Universal Waste One Year Accumulation and Multiple Handlers

EPA530-R-98-005c

NTIS SUB-9224-98-003

March 1, 1998

1. Universal Waste Storage Time Limits & Multiple Handlers

The universal waste management standards of 40 CFR Part 273 outline streamlined provisions for managing universal wastes. Section 273.6 defines a universal waste as hazardous waste batteries, canceled pesticides, and mercury thermostats. A generator of universal waste, or a facility that receives universal waste from offsite and sends the waste to another universal waste participant, may meet the definition of a universal waste handler. Facilities which meet the definition of a universal waste handler may accumulate universal waste for up to one year from the date the waste is generated or received from another handler. Since handlers may then transport the universal waste to other off-site handlers, can each individual handler take advantage of the one-year accumulation provision?

When universal waste is transferred and accumulated by multiple handlers, each individual handler may utilize the one-year accumulation provisions of §§273.15 and 273.35, since each location at which universal wastes are consolidated and/or collected is regulated as a separate handler. Accumulation of universal waste by a handler for a period over one year may be allowed if the handler can prove such activity is solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal (§§273.15(b) and 273.35(b)).

RCRA Online Number: 14179

[http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/67C8FA588C73D23A852568E3004681AD/\\$file/14179.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/67C8FA588C73D23A852568E3004681AD/$file/14179.pdf)

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