

<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
1296. Universal Waste and Multiple Handlers at One Facility		SEP 13, 2018
1297. Universal Waste, Satellite Accumulation and Centralized Collection Areas	ENCORE	SEP 20, 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, SATELLITE ACCUMULATION AND CENTRALIZED COLLECTION AREAS

**DATE:** SEPTEMBER 20, 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, Satellite Accumulation and Centralized Collection Areas

**Q:** A customer has been collecting universal waste at multiple locations throughout the customer's facility. The customer has been keeping the universal waste collection areas "at or near" the original point of generation analogous to the satellite accumulation area (SAA) requirements. However, the customer would like to routinely consolidate the multiple universal waste locations to a centralized collection point for ease of shipment preparation. Is universal waste required to be collected near the original point of generation analogous to the SAA requirements?

**A:** Per the [May 11, 1995, Federal Register](#) on page 25527 it states:

*"The Agency has decided not to add a provision analogous to the satellite accumulation provision to the universal waste regulations for several reasons."*

Those reasons basically included: 1), universal waste handlers already manage their universal wastes very similarly to SAA requirements in that the number of locations is not limited. 2), unlike unlimited accumulation time for SAAs, universal waste is limited to one year of accumulation; however, if universal waste needs to be accumulated for more than one year the generator can exceed the one-year limit if the accumulation is necessary to facilitate proper recovery, treatment or disposal. And 3), since the goal of the universal waste regulations was to make the regulation clear and easy to work with for both the regulated community and the implementing agencies, EPA believed that having one consistent time limit for all universal waste managed at one site was an important goal.

Since the customer "may" accumulate universal waste at multiple locations, the converse is true that the customer may also accumulate universal waste in one centralized location. In this sense, universal waste accumulation is more analogous to  $\leq 90$ -day accumulation areas, i.e., a generator can generate hazardous waste at multiple locations and accumulate the waste in a centralized accumulation area.

### SUMMARY:

- Universal waste regulations do not limit the accumulation location or the number of locations.
- The SAA requirements do not apply to universal waste, e.g., "at or near" does not apply.
- A universal waste handler can accumulate at the point of generation or at a centralized area.

An excerpt from the May 11, 1995, Federal Register is 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: 9/20/19

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** Universal Waste, Satellite Accumulation and Centralized Collection Areas

**25527 Federal Register** / Vol. 60, No. 91 / Thursday, May 11, 1995 / Rules and Regulations

“The Agency has decided not to add a provision analogous to the satellite accumulation provision to the universal waste regulations for several reasons. **First**, under the universal waste final rule, handlers may already manage their wastes very similarly to management under the satellite accumulation provision. For example, the proposed and final universal waste regulations do not limit the location, or number of locations, at which a handler of universal waste may accumulate universal wastes. Thus a handler may continue to accumulate universal wastes at points of generation. A handler may accumulate these wastes for up to one year (which is two or four times longer than the 90 or 180 days allowed under the existing hazardous waste generator regulations), and under the revised final regulation a handler may accumulate universal waste for longer than one year if certain conditions are met. Further, the quantity of universal waste that can be accumulated at a point of generation is not limited to 55 gallons (a handler of universal waste must notify, however, if the total quantity of universal wastes accumulated on-site equals or exceeds the 5,000-kilogram notification limit). The only substantive additional requirement under the universal waste rule will be to mark or label the container (or use an alternate method) to document the earliest date any universal waste accumulated at the location became a waste.

**Second**, although the time limit may appear to be a constraint when compared to the satellite accumulation provision, with the revision discussed above, handlers of universal waste who need to accumulate wastes for more than one year to facilitate proper recovery, treatment, or disposal will have the option to do so. The handler, however, bears the burden of proving that such activity is solely for the purpose of accumulation of such quantities of universal waste as necessary to facilitate proper recovery, treatment, or disposal. In addition, the Agency points out that the existing satellite accumulation provisions are available only to regulated generators who have EPA identification numbers and are complying with the full part 262 requirements including 90- or 180-day accumulation time limits 40 CFR 262.34 accumulation unit standards, biennial reports, and manifests. The Agency does not believe it would be appropriate to allow unlimited accumulation time for handlers of universal waste who are not required to comply with the part 262 controls, but are instead following the streamlined requirements of the universal waste regulations.

**Third**, the Agency points out that one of its major goals in developing the universal waste regulations is to make the regulation clear and easy to work with for both the regulated community and implementing agencies. The Agency believes that having one consistent time limit for all universal waste managed at one site is important to this goal. The Agency also notes that handlers of universal waste who generate extremely small quantities of hazardous waste (<100 kg per month) would, under the final rule, still have the option to manage their wastes under the Conditionally Exempt Small Quantity Generator provisions of 40 CFR 261.5 rather than the universal waste regulations (or the full Subtitle C regulations).”

**FROM:** Paul W. Martin

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