

<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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1297.	Universal Waste, Satellite Accumulation and Centralized Collection Areas		SEP 20, 2018
1298.	Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements	ENCORE	SEP 27, 2018
1299.	Satellite Accumulation and the One Year LDR Prohibitions on Storage	ENCORE	OCT 4, 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: SATELLITE ACCUMULATION AND THE ONE YEAR LDR PROHIBITIONS ON STORAGE

DATE: OCTOBER 4, 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 Ehliis 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: Satellite Accumulation and the One Year LDR Prohibitions on Storage

Q: It is understood that a satellite accumulation area (SAA) container has no time limit in terms of storage; only a quantity limit. However, if the SAA container accumulated waste subject to the land disposal restrictions (LDR), would the one-year prohibition on storage at [40 CFR 268.50](#) apply?

A: Per the [January 14, 1986, Federal Register](#) on page 1709:

"The Agency does not interpret the statutory restriction on the storage of prohibited wastes as overriding the satellite accumulation rule contained in 40 CFR 262.34(c) [now 40 CFR 262.15]. That rule allows generators to accumulate up to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in a container, at or near the point of generation, without a permit, interim status, or compliance with the 90-day accumulation rule. The purpose of satellite accumulation is to allow the accumulation of certain quantities necessary to facilitate transportation, further treatment, or disposal and, thus, such accumulation falls under the section [3004\(j\)](#) exemption."

Therefore, a satellite container can accumulate wastes for more than one year, assuming that the quantity limits stated at [WAC 173-303-200\(2\)](#) [[40 CFR 262.15](#)] are not exceeded and that all other satellite accumulation requirements are met.

SUMMARY:

- Satellite containers accumulating waste have no storage time limits.
- Satellite containers do have storage quantity limits.
- The one year prohibitions for storage of LDR wastes does not apply to satellite containers.

Excerpts from 40 CFR 268.50 are 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: 10/4/18

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Satellite Accumulation and the One Year LDR Prohibitions on Storage

40 CFR §268.50 Prohibitions on storage of restricted wastes

(a) Except as provided in this section, the storage of hazardous wastes restricted from land disposal under subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met:

(1) A generator stores such wastes in tanks, containers, or containment buildings on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and the generator complies with the requirements in §§262.16 and 262.17 and parts 264 and 265 of this chapter.

(2) An owner/operator of a hazardous waste treatment, storage, or disposal facility stores such wastes in tanks, containers, or containment buildings solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and:

(i) Each container is clearly marked to identify its contents and with:

(A) The words “Hazardous Waste”;

(B) The applicable EPA hazardous waste number(s) (EPA hazardous waste codes) in subparts C and D of part 261 of this chapter; or use a nationally recognized electronic system, such as bar coding, to identify the EPA hazardous waste number(s);

(C) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (*i.e.*, ignitable, corrosive, reactive, toxic); hazard communication consistent with the Department of Transportation requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the Occupational Safety and Health Administration Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the National Fire Protection Association code 704); and

(D) The date each period of accumulation begins.

(ii) Each tank is clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility. Regardless of whether the tank itself is marked, an owner/operator must comply with the operating record requirements specified in §264.73 or §265.73.

(3) A transporter stores manifested shipments of such wastes at a transfer facility for 10 days or less.

(b) An owner/operator of a treatment, storage or disposal facility may store such wastes for up to one year unless the Agency can demonstrate that such storage was not solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

(c) An owner/operator of a treatment, storage or disposal facility may store such wastes beyond one year; however, the owner/operator bears the burden of proving that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal.

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Satellite Accumulation and the One Year LDR Prohibitions on Storage

SOLID WASTE DISPOSAL ACT¹

[As Amended Through P.L. 115–232, Enacted August 13, 2018]

TITLE II—SOLID WASTE DISPOSAL

STANDARDS APPLICABLE TO OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

SEC. 3004.

(j) **STORAGE OF HAZARDOUS WASTE PROHIBITED FROM LAND DISPOSAL.** — In the case of any hazardous waste which is prohibited from one or more methods of land disposal under this section (or under regulations promulgated by the Administrator under any provision of this section) the storage of such hazardous waste is prohibited unless such storage is solely for the purpose of the accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.

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