

<u>SUBJECT</u>		<u>DATE</u>
1056. Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	APR 23, 2015
1057. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	APR 30, 2015
1058. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAY 7, 2015
1059. Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAY 14, 2015
1060. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAY 21, 2015
1061. Hazardous Debris Macroencapsulation and Size Reduction	ENCORE	MAY 28, 2015
1062. Universal Waste Lamps and Prohibition on Crushing		JUN 4, 2015
1063. F003 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 11, 2015
1064. F001 - F005 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 18, 2015
1065. Macroencapsulation of Hazardous Debris and Presence of Free Liquids	ENCORE	JUN 25, 2015
1066. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries		JUL 1, 2015
1067. Used Oil Eligibility for Animal and Vegetable Oils	ENCORE	JUL 9, 2015
1068. Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils		JUL 16, 2015
1069. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 23, 2015
1070. Conditioned Exclusion for Characteristic Debris Treated via Immobilization		JUL 30, 2015
1071. RCRA Personnel Training and Classroom Training vs. Online Training		AUG 6, 2015
1072. PCB Decontamination Standards with No Decontamination Performed		AUG 13, 2015
1073. PCB Manifest Exceptions a.k.a. When is a PCB Manifest Not Required	ENCORE	AUG 19, 2015
1074. PCB Manifest Relief a.k.a. When is a PCB Manifest Not Required – The Sequel		AUG 27, 2015
1075. Hazardous Debris and Radioactively Contaminated Cadmium Batteries	ENCORE	SEP 3, 2015
1076. Hazardous Debris and Radioactively Contaminated Lead Acid Batteries	ENCORE	SEP 10, 2015
1077. Mercury Wet Cell Batteries - Debris or Not Debris	ENCORE	SEP 17, 2015
1078. Hazardous Debris and Non-Radioactive Lead Acid Batteries		SEP 24, 2015
1079. Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE	OCT 1, 2015
1080. CAS Numbers and the Hazardous Waste "U" and "P" Listings	ENCORE	OCT 8, 2015
1081. Universal Waste One Year Accumulation and Multiple Handlers	ENCORE	OCT 15, 2015

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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:** OCTOBER 15, 2015

<u>CHPRC Projects</u>	<u>CHPRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Ty Blackford Bob Cathel 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 Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Roni Swan Michael Waters Jeff Widney	Brett Barnes Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Ray Swenson Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Christina Robison Don Rokkan Lana Strickling Lou Upton	(TBD)  <u>DOERL, ORP, WIPP</u>  Mary Beth Burandt Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts 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 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 Kyle Webster Jeff Westcott 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](#) 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, please contact me at “Paul\_W\_Martin@rl.gov” or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 10/15/15

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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 and Accumulation for No Longer than One Year

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/67C8FA588C73D23A852568E3004681A/\\$file/14179.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/67C8FA588C73D23A852568E3004681A/$file/14179.pdf)

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