

<u>SUBJECT</u>		<u>DATE</u>
1320.	Treated Hazardous Waste Used as Dust Suppressant	FEB 28, 2019
1321.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE MAR 7, 2019
1322.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE MAR 14, 2019
1323.	Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE MAR 21, 2019
1324.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE MAR 28, 2019
1325.	PCB Decontamination Standard with No Decontamination Performed	ENCORE APR 4, 2019
1326.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE APR 11, 2019
1327.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE APR 18, 2019
1328.	PCB Concentrations and Micrograms per Centimeters Squared (µg/cm ²)	ENCORE APR 25, 2019
1329.	Operating Record vs. Operating Log	ENCORE MAY 2, 2019
1330.	Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE MAY 9, 2019
1331.	Washington State Used Oil and Mixtures with Other Materials	ENCORE MAY 16, 2019
1332.	Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE MAY 23, 2019
1333.	Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE MAY 30, 2019
1334.	Universal Waste Alkaline Batteries and Self-Transportation	ENCORE JUN 6, 2019
1335.	Universal Waste Lithium Batteries and Self-Transportation	ENCORE JUN 13, 2019
1336.	RCRA Hazard Labeling – A Random Scenario	ENCORE JUN 20, 2019
1337.	Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE JUN 27, 2019
1338.	Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE JUL 3, 2019
1339.	The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE JUL 11, 2019
1340.	Central Accumulation Areas and Signage Requirements	ENCORE JUL 18, 2019
1341.	RCRA EPA Identification Numbers – Site Specifics	ENCORE JUL 25, 2019
1342.	RCRA EPA Identification Numbers – Transporters	ENCORE AUG 1, 2019
1343.	Paint Wastes and the Applicability of the F001-F005 Listings to Ingredients	ENCORE AUG 8, 2019
1344.	F Listings and Ingredients in Commercial Chemical Product Formulations	ENCORE AUG 15, 2019
1345.	PCB Containers and ≥50 ppm	ENCORE AUG 22, 2019
1346.	CERCLA Hazardous Substances – The Petroleum Exclusion	ENCORE AUG 29, 2019
1347.	PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE SEP 5, 2019
1348.	RCRA LR One-Year Storage Prohibition vs., PCB One-Year Disposal Time Limit	ENCORE SEP 12, 2019
1349.	Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978	ENCORE SEP 19, 2019
1350.	Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978 – A Follow-Up	ENCORE SEP 26, 2019
1351.	PCB Waste Regulation and April 18, 1978 vs. July 2, 1979	ENCORE OCT 3, 2019
1352.	PCB Waste Storage Limitations and the One-Year Extension	ENCORE OCT 10, 2019
1353.	PCB Waste Storage Limitations and the PCB Radioactive Waste Exemption	ENCORE OCT 17, 2019
1354.	LDR One-Year Storage Prohibition and Generator Permitted Storage	ENCORE OCT 24, 2019
1355.	LDR Notifications and Generator Permitted Storage	ENCORE OCT 31, 2019



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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: LDR NOTIFICATIONS AND GENERATOR PERMITTED STORAGE

DATE: OCTOBER 31, 2019

<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: LDR Notifications and Generator Permitted Storage

Q: In last year's Halloween Two Minute Training (H2MT), a company called, "Zombie Emergency Removal Operational Services", (ZEROS) had a specialty chemical used to dissolve deactivated zombies. Another company called, "Unrelated to Zombie Work", (UZW) had a chemical used to decontaminate interstellar space vehicles. The companies collaborated and realized that the UZW's highly corrosive hazardous waste was a good candidate for ZEROS to use as a product to dissolve deactivated zombies. Hence, UZW's waste became ZEROS product and therefore not regulated as a hazardous waste until spent. Since that time ZEROS and UZW have merged forming a new company called D-ZEROS-2 (NSYE: D002). Their question, as related to last week's [2MT](#), is on the applicability of the land disposal restrictions (LDR) notification requirements for a generator's onsite storage facility. If D-ZEROS-2 generates an LDR hazardous waste from dissolving deactivated zombies, and they send the waste to their onsite storage facility, must D-ZEROS-2 send an LDR notice to itself, notifying that the waste requires treatment prior to land disposal?

A: Per the [November 7, 1986, Federal Register](#) on page 40597, it basically states that a generator of a restricted waste must notify the treatment facility in writing of the appropriate LDR treatment standard for the waste. The Federal Register goes on to state:

"Generators who are also treatment, storage, and disposal facilities must place the same information in the operating record although a formal notification and manifest is not required."

Since a formal LDR notification is not required, the generator can maintain the elements of the LDR notification as required by [40 CFR 268.7](#)(a)(2), (3), (4) or (9), e.g., EPA hazardous waste numbers; nonwastewater/wastewater category; waste analysis data if available; etc., in various locations of the generator's operating record. Note that the onsite transportation of dissolved zombie carcasses does not require a manifest and hence the manifest is not an element of the onsite generator's LDR notification.

Therefore, D-ZEROS-2 would not need formal LDR notifications but would be required to maintain the elements of an LDR notification for any LDR hazardous waste generated and stored on their site.

PS: Waste from the dissolved deactivated zombies would be very...organic, and whether RCRA would apply is debatable. However, in this alternate reality EPA regulates this waste as D002-Z with specified technology treatment standards of BIODG, CMBST, or ZOMBI. See [40 CFR 268.42](#) for further details.

SUMMARY:

- ☛ A generator can transfer LDR hazardous waste to their onsite storage facility.
- ☛ Even though the storage is onsite, the generator must have the same LDR notification elements in their operating record as any generator would have when shipping LDR waste offsite, except the manifest.
- ☛ Dissolved deactivated zombies are regulated as D002-Z hazardous waste and subject to LDR treatment.

How could I attach anything to this 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: 10/31/19

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