

<u>SUBJECT</u>		<u>DATE</u>
1394. RCRA Empty vs. DOT Empty	ENCORE	JUL 30, 2020
1395. RCRA Empty vs. DOT Empty II	ENCORE	AUG 6, 2020
1396. Empty Containers and the "Empty" Label	ENCORE	AUG 13, 2020
1397. Exceptions to Free Liquids in Landfills Prohibition	ENCORE	AUG 20, 2020
1398. Dust Suppression in Landfills with Nonhazardous Liquids	ENCORE	AUG 27, 2020
1399. Treated Hazardous Wastes Used as Dust Suppressant	ENCORE	SEP 3, 2020
1400. Regulatory Status of Used Oil Mixed with Diesel Fuel	ENCORE	SEP 10, 2020
1401. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	SEP 17, 2020
1402. Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements	ENCORE	SEP 24, 2020
1403. Smoke Detector Disposal and the NRC	ENCORE	OCT 1, 2020
1404. DOT Shipping of Damaged, Defective, or Recalled Lithium Batteries	ENCORE	OCT 8, 2020
1405. Conservative Declaration that Material is a Hazardous Waste	ENCORE	OCT 15, 2020
1406. Manifest Exception Report Submittal Timeframes – RCRA vs. TSCA	ENCORE	OCT 22, 2020
1407. Characteristic Ignitable, Corrosive or Reactive Debris and Macroencapsulation	ENCORE	OCT 29, 2020
1408. RCRA Satellite Accumulation Areas and Applicability of Personnel Training		NOV 5, 2020

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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: RCRA SATELLITE ACCUMULATION AREAS AND APPLICABILITY OF PERSONNEL TRAINING

DATE: NOVEMBER 5, 2020

<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 Laura Cusack Stuart Hildreth Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Stuart Mortensen Dave Richards Dave Shea Phil Sheely Connie Simiele Jeff Westcott	Jeff Bramson Bob Bullock Frank Carleo Danielle Collins Bill Cox Jeanne Elkins Ryan Fisher Jonathan Fullmer Barry Lawrence Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Linda Petersen Sean Sexton Kat Thompson Wayne Toebe Daniel Turlington	Brett Barnes Michael Carlson Mike Demiter Kip George Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Matt Mills Carly Nelson Michelle Oates Eric Pennala Jon Perry Christina Robison Christian Seavoy David Shaw John Skoglie Lana Strickling Greg Sullivan	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Al Farabee Tony McKarns	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Mike Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Kirk Peterson	Dan Saueressig Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: RCRA Satellite Accumulation Areas and Applicability of Personnel Training

Q: A customer has a worker dedicated to working the company's satellite accumulation area (SAA), i.e., this worker does not work in the company's ≤90-day central accumulation area (CAA), only the SAA. The customer is aware that the CAA workers need RCRA personnel training, but does the SAA worker also need RCRA personnel training?

A: A review of [WAC 173-303-174](#), "Satellite accumulation area regulations for medium quantity generators and large quantity generators" [[40 CFR 262.15](#)] and a search for the word "train" or regulatory references related to personnel training returned no results. As clarified in the [November 28, 2016, Federal Register](#) on page 85797:

"Comments were roughly split on whether EPA should require hazardous waste training for personnel who work at SAAs. Taking into account the differing opinions of commenters, the existence of EPA guidance on this point and the desire to maintain flexibility, the Agency has decided not to revise § 262.17(a)(7) to identify areas of hazardous waste management for which personnel training and a written job description are required or to specifically require training for staff at SAAs. However, EPA would encourage all generators to take appropriate steps to ensure that all employees who work at areas where hazardous waste is accumulated, including at SAAs, or are otherwise involved in hazardous waste management receive sufficient training to ensure that they are familiar with proper handling and emergency procedures."

Therefore, personnel training is not required for a worker dedicated to an SAA; however, EPA did encourage personnel training for SAA workers, but did not require it.

WAC 173-303-174 parallels 40 CFR 262.15 and therefore, personnel training would not apply to a dedicated SAA worker. However, WAC 173-303-174(2) has additional wording stating:

"On a case-by-case basis the department may require the satellite accumulation area to be managed in accordance with all or some of the requirements under [WAC 173-303-172](#) or [173-303-200](#) and secondary containment requirements of [WAC 173-303-630\(7\)](#), if the nature of the wastes being accumulated, a history of spills or releases from accumulated containers, or other factors are determined by the department to be a threat or potential threat to human health or the environment."

This means that the WA Department of Ecology could impose CAA requirements such as personnel training on SAA workers, if Ecology determined that there was a threat or potential threat to human health or the environment due to this lack of personnel training.

Note: It would probably be an unusual situation where a worker is dedicated to only an SAA. It would be more likely that the company would assign a dangerous waste worker to various waste management duties and hence that worker would be subject to personnel training.

SUMMARY:

- Workers assigned to SAAs are not subject to RCRA personnel training.
- However, EPA encouraged personnel training for SAA workers to ensure familiarity with proper handling and emergency procedures.
- Note that the State of WA could impose personnel training requirements on SAA workers if a threat to human health or the environment was determined.

Nothing 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: 11/5/2020

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