

<u>SUBJECT</u>		<u>DATE</u>
1056. PCB Reporting and Recordkeeping Relief	ENCORE	JAN 12, 2014
1057. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 16, 2014
1058. PCB Annual Records Retention Timeframes		JAN 31, 2014
1059. Satellite Accumulation within a ≤90-day Accumulation Area		FEB 7, 2014
1060. PCB Certificate of Disposal Relief	ENCORE	FEB 13, 2014
1061. Used Oil and Weekly Inspections		FEB 20, 2014
1062. Bags and RCRA Container Definition		FEB 27, 2014
1063. Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	MAR 6, 2014
1064. Spent Lead-Acid Batteries and Accumulation Time Limits		MAR 13, 2014
1065. Land Disposal Restrictions and Dates of Accumulation		MAR 23, 2014
1066. Universal Waste Accumulation Time Limits and the One Year Rule		MAR 29, 2014
1067. PCB Manifest Discrepancy Reports and Estimated Waste Weights		APR 6, 2014
1068. PCB Wastes, Independent Transporters and Confirmation of Receipt		APR 10, 2014
1069. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	APR 20, 2014
1070. Other Paint Wastes and the Applicability of the F001-F005 Listings	ENCORE	APR 24, 2014
1071. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents		MAY 1, 2014
1072. TSCA "No PCBs" versus "Non-PCBs" versus "Nondetectable PCBs"	ENCORE	MAY 8, 2014
1073. Purpose of Keeping a Hazardous Waste Container Closed	ENCORE	MAY 15, 2014
1074. PCB Containers and Multiple Removed From Service Dates		MAY 22, 2014
1075. Satellite Accumulation and RCRA Personnel Training		MAY 29, 2014
1076. Transporter Signatures on Hazardous Waste Manifest and Multiple Drivers		JUN 5, 2014
1077. Universal Waste and Nonhazardous Batteries		JUN 12, 2014
1078. Universal Waste and Incandescent Bulbs		JUN 19, 2014
1079. The PCB Mark and the Fields "Also Contact" and "Tel No"	ENCORE	JUN 29, 2014
1080. Halon Fire Extinguishers - Banned or Not Banned?	ENCORE	JUL 5, 2014
1081. Cabinets as RCRA Containers	ENCORE	JUL 13, 2014
1082. LDR Storage Prohibitions and Treated Wastes	ENCORE	JUL 17, 2014
1083. LDR Treatment Standards and F001 "Chlorinated Fluorocarbons"	ENCORE	JUL 24, 2014
1084. RCRA Regulatory Status of Chlorinated Fluorocarbons Used as Refrigerants	ENCORE	JUL 31, 2014
1085. Universal Wastes, Manifesting and DOT Shipping Names		AUG 7, 2014
1086. CERCLA Hazardous Substances – A Brief Definition		AUG 14, 2014
1087. CERCLA Hazardous Substances – The Petroleum Exclusion		AUG 21, 2014
1088. PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE	AUG 28, 2014
1089. Universal Waste and Basis for the One Year Accumulation Time Limit		SEP 4, 2014
1090. Product Spills and Waste Determinations	ENCORE	SEP 11, 2014
1091. PCB Concentrations and 10,000 PPM		SEP 18, 2014
1092. PCB Concentrations and 1,000 PPM		SEP 25, 2014
1093. Universal Waste Alkaline Batteries and Self-Transportation		OCT 2, 2014
1094. Universal Waste Lithium Batteries and Self-Transportation		OCT 9, 2014
1095. Universal Waste Batteries and Closed Containers	ENCORE	OCT 16, 2014
1096. PCB Containers and Concentration of PCBs		OCT 23, 2014
1097. Recyclable Chemicals and Zombie Destruction		OCT 31, 2014
1098. Satellite Accumulation Requirements in Washington State	ENCORE	NOV 6, 2014

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TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, Senior Environmental Compliance Officer
CHPRC Environmental Protection, Hanford, WA

SUBJECT: SATELLITE ACCUMULATION REQUIREMENTS IN WASHINGTON STATE

DATE: NOVEMBER 6, 2014

<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 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 Westcott Jeff Widney	Brett Barnes Ron Brunke Bill Cox Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver 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 Don Rokkan Lana Strickling Lou Upton Christina Zerby	Alan Campbell Grant McCalmant <u>DOE RL, 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 Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Judith Nielsen Mandy Pascual Kirk Peterson Jean Quigley	Mark Rollison Dan Saueressig Merrie Schilperoort Joelle Stamm Glen Triner Greg Varljen Julie Waddoups Kyle Webster Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: Satellite Accumulation Requirements in Washington State

Q: What is a "satellite accumulation area" (SAA) and what are the basic requirements for an SAA in Washington State?

A: Per WAC 173-303-040, "Definitions", a satellite accumulation area means:

"A location at or near any point of generation where hazardous waste is initially accumulated in containers (during routine operations) prior to consolidation at a designated 90-day accumulation area or storage area. The area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes into the satellite containers."

Then per WAC 173-303-200(2) [40 CFR 262.34(c)], "Satellite Accumulation", a generator can accumulate up to 55 gallons of hazardous wastes (D, F, K, and U listed wastes) and WA State-Only dangerous waste (WT01, WT02, WP01 - WP03, WSC2 or WPCB), or 1 quart of acutely hazardous wastes (F listed dioxin & P listed wastes) in containers at SAAs meeting the definition at WAC 173-303-040.

A generator can accumulate waste at an SAA without a permit provided the generator complies with WAC 173-303-630:

- | | |
|---|---|
| (2) [Containers in good condition] | (8)(a) [D003 wastes stored per specified fire codes]* |
| (4) [Containers and waste are compatible] | (9)(a) [incompatible wastes not be placed in the same container]* |
| (5)(a) [Containers kept closed] | (9)(b) [incompatible waste not placed in an unwashed container]* |
| (5)(b) [Ruptures or leaks are prevented]* | |

*Requirements unique to Washington State and not found in Federal Regulations at 40 CFR 262.34(c).

Each SAA container must also be labeled or marked clearly with the words "dangerous waste" or "hazardous waste" and with a label or mark which identifies the major risk(s)* associated with the waste, e.g., the applicable DOT hazard class label or mark.

Concerning the accumulation point for a satellite location, it must be "at or near" the point where the wastes initially accumulate. This would basically mean that the satellite container must be at the point of generation. A conservative compliance method for the "at or near" requirement is to have the SAA container in the same room, or the same designated or marked-off area if in an open factory, as the process that generates the waste. However, WA State gives some relief to "at or near" since the State requires that in addition to the SAA being under the control of the operator the SAA can also be secured at all times to prevent improper additions to the SAA.*

When the satellite accumulation area reaches 55 gallons, the satellite container must be dated with the date the 55-gallon limit was reached. Then, within three days of that date, the container must be moved to the generator's designated 90-day storage area or transferred to a RCRA permitted facility. The 90-day accumulation "clock" begins when 55 gallons of waste is accumulated at the SAA.* (See [Technical Information Memorandum, 94-120](#) for WA State specific details).

Note that Federal guidance allows the 90-day clock to begin when the full SAA is received at the 90-day accumulation area. In other words, the 90-day clock under Federal regulation could start up to three days after the drum was filled and actually placed in 90-day storage - not on the day it was filled. (Source: EPA guidance [Frequently Asked Questions about Satellite Accumulation Areas](#).)

SUMMARY:

- WA generators can accumulate 55 gallons of hazardous/dangerous waste or 1 quart of acutely hazardous waste at SAAs.
- Satellite areas must be at or near the point of generation with containers in good condition, compatible, kept closed, etc.
- When the SAA volume limit is reached the waste must be moved to a designated area.

WAC 173-303-200(2), an excerpt from 173-303-040 and 40 CFR 262.34(c) are attached to the e-mail. If you have any question, please contact me at Paul_W_Martin@rl.gov" or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 11/6/14

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Satellite Accumulation Requirements in Washington State

WAC 173-303-200 **Accumulating dangerous waste on-site.**

(2) Satellite accumulation.

(a) A generator may accumulate as much as fifty-five gallons of dangerous waste or one quart of acutely hazardous waste in containers at or near any point of generation where waste initially accumulates (defined as a satellite accumulation area in WAC 173-303-040). The satellite area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes to a satellite container. Satellite accumulation is allowed without a permit provided the generator:

- (i) Complies with [WAC 173-303-630](#) (2), (4), (5) (a) and (b), (8)(a), and (9) (a) and (b); and
- (ii) Complies with subsection [\(1\)\(d\)](#) of this section.

(b) When fifty-five gallons of dangerous waste or one quart of acutely hazardous waste is accumulated per waste stream, the container(s) must be marked immediately with the accumulation date and moved within three days to a designated storage or accumulation area.

(c) On a case-by-case basis the department may require the satellite area to be managed in accordance with all or some of the requirements under subsection [\(1\)](#) of this section, 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.

(3) For the purposes of this section, the ninety-day accumulation period begins on the date that:

- (a) The generator first generates a dangerous waste; or
- (b) The quantity (or aggregated quantity) of dangerous waste being accumulated by a small quantity generator first exceeds the accumulation limit for such waste (or wastes); or
- (c) 55 gallons of dangerous waste or 1 quart of acutely hazardous waste, per waste stream, is accumulated in an SAA.

WAC 173-303-040 **Definitions.**

"Satellite accumulation area" means a location at or near any point of generation where hazardous waste is initially accumulated in containers (during routine operations) prior to consolidation at a designated ninety-day accumulation area or storage area. The area must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes into the satellite containers.

40 CFR 262.34 **Accumulation time.**

(c)

(1) A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste listed in [§261.31](#) or [§261.33\(e\)](#) in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with paragraph (a) or (d) of this section provided he:

- (i) Complies with [§§265.171, 265.172, and 265.173\(a\)](#) of this chapter; and
- (ii) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

(2) A generator who accumulates either hazardous waste or acutely hazardous waste listed in [§261.31](#) or [§261.33\(e\)](#) in excess of the amounts listed in paragraph (c)(1) of this section at or near any point of generation must, with respect to that amount of excess waste, comply within three days with paragraph (a) of this section or other applicable provisions of this chapter. During the three day period the generator must continue to comply with paragraphs (c)(1)(i) and (ii) of this section. The generator must mark the container holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.

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