

<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
1409. The Hazardous Waste Generator Improvements Rule and Designation of Nonhazardous Waste		NOV 12, 2020
1410. RCRA Aisle Space Requirements and Washington State vs., EPA		NOV 19, 2020
1411. The Definition of Good Housekeeping	ENCORE	NOV 24, 2020
1412. Absorbent Additions and Treatment	ENCORE	DEC 3, 2020
1413. LDR Notifications and F001-F005 Constituents of Concern	ENCORE	DEC 10, 2020
1414. LDR Notifications and F001-F005 Constituents of Concern – Again!	ENCORE	DEC 17, 2020

Approved for Public Release;  
Further Dissemination Unlimited

**DISCLAIMER** - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

## 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 F001-F005 CONSTITUENTS OF CONCERN – AGAIN!

**DATE:** DECEMBER 17, 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 Richard Lipinski Stuart Mortensen Dave Richards Sean Sexton Dave Shea Phil Sheely Connie Simiele Jeff Westcott	Jeff Bramson Bob Bullock Frank Carleo Danielle Collins Jennifer Copeland Jeanne Elkins Ryan Fisher Jonathan Fullmer Steve Heninger Julie Johanson Barry Lawrence Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Chris Plager Linda Petersen Brent Porter Dale Snyder Kat Thompson Wayne Toebe Daniel Turlington Britt Wilkins	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 Skogleie 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

Approved for Public Release;  
Further Dissemination Unlimited

**DISCLAIMER** - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

## TWO MINUTE TRAINING

**SUBJECT:** LDR Notifications and F001-F005 Constituents of Concern – Again!

**Q:** A generator uses xylene to cleanup a fresh paint spill. Based on analysis the generator knows that the wastestream contains xylene, paint, and trace amounts of acetone and methanol used as ingredients in the paint. Since the xylene was clearly used as a solvent the wastestream is designated as F003 and destined for treatment to meet the land disposal restrictions (LDR) treatment standard. Considering last week's "Two Minute Training" on constituents of concern, which constituents (xylene, acetone and/or methanol) would the generator identify on the LDR form as constituents of concern?

**A:** As we learned last week, "constituents of concern" include only those F001 - F005 constituents that exceed an applicable LDR treatment standard and require treatment to meet an LDR standard. The xylene is a constituent of concern since it is an F003 constituent that exceeds the applicable LDR treatment standard. The acetone and methanol are not constituents of concern since the acetone and methanol were used as ingredients in the paint, which under RCRA do not meet an F listing description. Since the acetone and methanol do not meet the F003 listing description, they cannot be constituents of concern.

An [EPA Memo dated March 1990 \(RO 13359\)](#) addressed a similar situation with xylene as a solvent and methanol as a trace contaminant that had been used as a fuel. Since the methanol was used as a fuel and not as a solvent subject to the F listings, the methanol was not a constituent of concern.

Therefore, the generator would identify only the xylene as a F001-F005 constituent of concern on the LDR form. The acetone and methanol do not meet an F001-F005 listing description and cannot be F001-F005 constituents of concern.

### SUMMARY:

- "Constituents of concern" for F001 - F005 wastes must be identified on the LDR notice.
- "Constituents of concern" include only those F001 - F005 constituents that exceed an applicable LDR treatment standard and require treatment to meet an LDR standard.
- If a waste contains constituents that do not meet the specific F001-F005 listing descriptions, those constituents are not F001-F005 constituents of concern.

The March 1990 EPA memo is 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:** 12/17/2020

**FILE:** 2MT\2020\121720.rtf

**PG:** 1

**DISCLAIMER** - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** LDR Notifications and F001-F005 Constituents of Concern – Again!

Faxback 13359

9554.1990(04)

RCRA/SUPERFUND HOTLINE SUMMARY

MARCH 1990

### 3. Treatment Standards for Methanol Which Does Not Meet the F003 Listing

A generator uses xylene for cleaning purposes. At the point of generation the generator determines that he has generated a F003 spent solvent waste, subject to the land disposal restrictions. The F003 listed waste has traces of methanol in it where the methanol was used as a fuel. Would the notification sent by the generator in 268.7(a)(1) to the treatment, storage or disposal facilities (TSDFs) have to include the corresponding treatment standards for methanol as well as for xylene?

No. The generator would only have to include the treatment standards for the xylene and not for the methanol to be in compliance with Section 268.7(a)(1). The methanol in this case was not used for its solvent properties and would not meet any of the spent solvent listings, which are prohibited from land disposal without first meeting the treatment standards in 40 CFR 268, Subpart D. The spent solvent listings cover only those solvents that are used for their solvent properties; which is to solubilize, dissolve or mobilize other constituents (51 FR 40606). A solvent is considered spent when it is no longer fit for use without being regenerated, reclaimed or otherwise reprocessed. Where solvents were used as reactants or ingredients in the formulation of commercial chemical products, they are not included in the listing (see December 31, 1985 Federal Register; 50 FR 53315 and the original solvent listing background document, November 14, 1980).

Supporting data should be maintained on-site in the generator's files.

Sources: Rhonda Craig, OSW (202) 382-7926  
Ron Josephson, OSW (202) 382-4792  
Thomas Ovenden, OSW (202) 475-6715

Research: Renee T. LaValle