

<u>SUBJECT</u>		<u>DATE</u>
1232. Used Oil, Secondary Containment and Response to Spills	ENCORE	JUN 15, 2017
1233. Used Oil and Keeping Containers Closed – Washington State vs. The Feds	ENCORE	JUN 21, 2017
1234. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries	ENCORE	JUN 29, 2017
1235. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 6, 2017
1236. Conditioned Exclusion for Characteristic Debris Treated via Immobilization	ENCORE	JUL 13, 2017
1237. Office Waste and RCRA Regulatory Status	ENCORE	JUL 20, 2017
1238. Office Waste Management	ENCORE	JUL 27, 2017
1239. RCRA EPA Identification Numbers – Site Specifics	ENCORE	AUG 3, 2017
1240. RCRA EPA Identification Numbers – Transporters		AUG 9, 2017
1241. Laboratory Standards and Applicability of the "U" or "P" Hazardous Waste Listings	ENCORE	AUG 17, 2017
1242. Laboratory Standards and Applicability of the "F" Listings	ENCORE	AUG 24, 2017
1243. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	AUG 31, 2017
1244. F Listings and Ingredients in Commercial Chemical Product Formulations		SEP 7, 2017
1245. LDR Waste That is Both Listed and Characteristic Hazardous Wastes	ENCORE	SEP 14, 2017
1246. Mercury Wet Cell Batteries - Debris or Not Debris?	ENCORE	SEP 21, 2017
1247. The "POLYM" Alternative Treatment Standard for Certain D001 Hazardous Wastes	ENCORE	SEP 28, 2017
1248. Elementary Neutralization and RCRA Requirements	ENCORE	OCT 5, 2017
1249. LDR Treatment Standards – Waste-Specific vs. Alternative		OCT 12, 2017
1250. Hazardous Debris and Non-Intact Lead-Acid Batteries	ENCORE	OCT 19, 2017
1251. Satellite Accumulation and "At or Near"	ENCORE	OCT 26, 2017
1252. Unmanifested Waste vs. Manifest Discrepancy	ENCORE	NOV 2, 2017
1253. Washington State Used Oil and Mixtures with Other Materials		NOV 9, 2017
1254. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1255. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1256. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1257. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1258. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1259. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1260. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017

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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:** THE PURPOSE OF KEEPING CONTAINERS CLOSED EXCEPT WHEN ADDING OR REMOVING WASTES

**DATE:** DECEMBER 28, 2017

<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:** The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes

**Q:** During "Bring your Sullen Teenager To Work Day", an all too worldly teenager asked our customer why containers of hazardous waste must always be closed, except when necessary to add or remove waste. It was explained to the teenager during the facility tour that keeping a container closed prevented spills in case containers are ever tipped over. The teenager mumbled, "That's stupid! How often do your guys knock over containers anyhow?" The teenager's comment caused our customer to ponder - "What is the purpose of the regulation to keep containers closed except when adding or removing wastes? Is it for more than just tipsy containers?"

**A:** [WAC 173-303-630\(5\)\(a\)](#), which is equivalent to the Federal regulations at [40 CFR 264.173\(a\)](#) and [40 CFR 265.173\(a\)](#), states essentially what the customer told the teenager, but does not state the purpose:

*"A container holding dangerous waste must always be closed, except when it is necessary to add or remove waste."*

In order to understand the purpose of keeping a hazardous waste container closed, it is necessary to review the May 19, 1980, Federal Register ([FR 45 33154](#)) on page 33199 which states:

*"Its purpose is, as it was originally, to minimize emissions of volatile wastes, to help protect ignitable or reactive wastes from sources of ignition or reaction, to help prevent spills, and to reduce the potential for mixing of incompatible wastes and direct contact of facility personnel with waste."*

Therefore our customer's response to the - let's say "inquisitive" teenager - was partially correct and in no way wrong. In addition to preventing spills, keeping a container closed also prevents emissions, explosions, and exposures. Not only would a closed container prevent a spill if tipped over; a closed container would also minimize volatile emissions, chances of an explosion and personnel exposures - even when the container is in an upright and stable position.

### SUMMARY:

- A container holding dangerous waste must always be closed, except when it is necessary to add or remove wastes.
- The purpose of a closed container is to minimize emissions, reactions, spills and exposures.
- The purpose of "Bring Your Sullen Teenager to Work Day" is, and remains, a mystery.

Nothing is attached. 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:** 122817

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