

<u>SUBJECT</u>		<u>DATE</u>
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

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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:** SATELLITE ACCUMULATION REQUIREMENTS AND CONTAINER INSPECTIONS

**DATE:** NOVEMBER 30, 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:** Satellite Accumulation Requirements and Container Inspections

**Q:** Per the satellite accumulation requirements at [WAC 173-303-200\(2\)](#) [[40 CFR 262.34\(c\)](#)]\*, a generator is not required to inspect satellite accumulation containers, even though generators are required to inspect containers in less than 90-day accumulation areas on at least a weekly basis. What's up with that?

**A:** Per WAC 173-303-200(2)(a)(i) it is clear that a generator does not have to inspect SAAs since the reference to container inspections at [WAC 173-303-630\(6\)](#) [[40 CFR 265.174](#)] is not included. The reason inspections are not required for SAAs was clarified in an EPA letter dated March 17, 2004, entitled, [Frequently Asked Questions about Satellite Accumulation Areas](#). The letter stated:

*"Inspections of containers (whether weekly or some other frequency) in SAAs are not required, so long as the provisions of 262.34(c) are met. **Section 265.174 which requires inspections, is not among the provisions listed in 262.34(c) for SAAs** (emphasis added). However, the SAA regulations do require that waste containers in an SAA must be under the control of the operator of the process generating the waste, in good condition ([265.171](#)), compatible with its contents ([265.172](#)), and closed except when adding or removing waste ([265.173](#)), which should achieve the goal of inspections: containers that are free of leaks and deterioration."*

Inspections of SAA containers are therefore not necessary since the SAA containers are under the control of the operator of the process generating the waste. The operator of a waste generating process is readily aware of the condition of the SAAs under his or her control and hence weekly inspections provide no added protection to the environment and are not necessary.

### SUMMARY:

- SAA regulations do not require that waste containers be inspected weekly.
- SAA regulations do require that waste containers be under the control of the operator of the process generating the waste.
- Since SAAs are under the control of the operator, container inspections are not necessary.

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.

\*40 CFR references are for 2016 since Washington and many other states have not yet adopted the 2017 regulations from the Hazardous Waste Generator Improvements Rule promulgated November 28, 2016 ([81 FR 85732](#)).

**FROM:** Paul W. Martin

**DATE:** 11/30/17

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