

<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
1415. 'Twas the Night before Christmas – The Twenty-Seventh Edition		DEC 24, 2020
1416. LDR Notifications and F001-F005 Constituents of Concern - One Last Time!	ENCORE	DEC 31, 2020
1417. RCRA Empty Containers and Removing as Much Waste as Possible	ENCORE	JAN 7, 2021
1418. Universal Waste, Incandescent Bulbs and Nonhazardous Bulbs	ENCORE	JAN 14, 2021
1419. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	JAN 21, 2021
1420. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 28, 2021
1421. Recycling of Non-Listed Commercial Chemical Products	ENCORE	FEB 4, 2021
1422. RCRA Personnel Training and Classroom Training vs. Online Training	ENCORE	FEB 11, 2021
1423. EPA Definition of "Annual" Refresher Training	ENCORE	FEB 18, 2021
1424. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit	ENCORE	FEB 25, 2021

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## TWO MINUTE TRAINING

**TO:** CENTRAL PLATEAU CLEANUP COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CPCCo Environmental Protection, Hanford, WA

**SUBJECT:** SATELLITE ACCUMULATION OF AEROSOL CANS AND DETERMINING THE 55-GALLON LIMIT

**DATE:** FEBRUARY 25, 2021

<u>CPCCo Projects</u>	<u>CPCCo - Env. Protection</u>	<u>HMIS</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Rene Catlow Richard Clinton Stuart Hildreth Stephanie Johansen Sasa Kosjerina Richard Lipinski Stuart Mortensen Dave Richards Sean Sexton Dave Shea Phil Sheely 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 Skogle 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:** Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit

**Q:** A customer has started accumulating empty and non-working, partially-full aerosol paint containers in a large 100-gallon tote that is being managed as a RCRA satellite accumulation area (SAA). As the aerosol cans accumulate, the customer is not sure how to determine when the 55-gallon limit is being approached. For these aerosol cans, should the SAA 55-gallon limit be determined based upon the accumulation of 55 gallons of aerosol cans (roughly a half-full 100-gallon tote), or based upon the accumulation of 55 gallons of the residues within the aerosol cans?

**A:** According to [WAC 173-303-174 \[40 CFR 262.15\]](#), a generator may accumulate as much as 55 gallons of dangerous/hazardous waste or either one quart of liquid acutely hazardous waste or 2.2 lbs., of solid acutely hazardous waste in containers at or near any point of generation where waste initially accumulates. The regulation does not give any details on how the 55-gallon or 1 quart/2.2 lb., limit is determined.

However, an EPA guidance letter dated February 17, 2016, ([RO 14875](#)) concerning satellite accumulation of containers with acutely hazardous waste residues stated:

*“... the residues remaining in containers that held commercial chemical products are hazardous wastes, and EPA has clarified on several occasions that a distinction may be drawn between the residues themselves and the container...”*

*Accordingly, the same principle would apply here, and the one-quart accumulation limitation in an SAA only applies to acute hazardous waste and any residues within the container. In your circumstances, the container itself does not need to be included when calculating the maximum accumulation volume of acute hazardous waste in an SAA.”*

Applying this acutely hazardous waste residue analogy to non-acutely hazardous waste aerosol cans with residues means the customer can calculate the residues remaining in the empty and partially full aerosol cans to determine when the 55-gallon limit is being approached. The customer could take a conservative approach, accumulate the aerosol cans in a 55-gallon container, and when full of cans, assume the 55-gallon limit has been reached even though there may only be a few gallons of actual hazardous waste residues. On the other hand, the customer could make defensible estimates or assumptions of how much residue remains in the aerosol cans as they are accumulated. With this option, the customer might be able to fill the 100-gallon tote to capacity and still not exceed the 55-gallon limit for the SAA.

Therefore, the 55-gallon limit for these aerosol cans can be based on the volume of residues remaining in the aerosol cans as opposed to the volume of the aerosol cans themselves.

### SUMMARY:

- SAs are limited to 55 gallons of hazardous/dangerous wastes or 1 quart/2.2 lbs., of acutely hazardous waste.
- The SAA limit could conservatively be based on the volume of the aerosol cans themselves.
- The SAA limit could also be based only on the volume of the residues remaining within the aerosol cans.

An excerpt from WAC 173-303-174 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:** 2/25/2021

**FILE:** 2MT\2021\022521.rtf

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit

**WAC 173-303-174 Satellite accumulation area regulations for medium quantity generators and large quantity generators.**

(1) A generator may accumulate as much as fifty-five gallons of dangerous waste or either one quart of liquid acutely hazardous waste or 2.2 lbs. of solid acutely hazardous waste (as defined in [WAC 173-303-040](#)) 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 accumulation 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. A generator may accumulate waste without a permit, or without complying with [WAC 173-303-400](#), [173-303-600](#), [173-303-692](#), and [173-303-800](#), provided that all the conditions for exemption in this section are met. A generator may comply with the conditions for exemption in this section instead of complying with the conditions for exemption in [WAC 173-303-172](#) and [173-303-200](#), except as required by (h) and (i) of this subsection. The conditions for exemption for satellite accumulation are:

- (a) Condition of containers...
- (b) Compatibility of waste with containers...
- (c) Management of containers...
- (d) Special requirements for reactive waste...
- (e) Special requirements for incompatible wastes...
- (f) Container labeling or marking...
- (g) Accumulation limits.
  - (i) The container(s) must be marked immediately with the accumulation start date; and
  - (ii) Moved within three consecutive calendar days to a permitted on-site designated storage area or an on-site central accumulation area or to a permitted off-site designated facility; and
  - (iii) During the three consecutive calendar day period the generator must continue to comply with all the conditions for exemption for satellite accumulation in this section.
- (h) All satellite accumulation areas operated by medium quantity generators must meet the preparedness and prevention regulations and the emergency procedures in WAC 173-303-172.
- (i) All satellite accumulation areas operated by large quantity generators must meet the preparedness, prevention and contingency regulations and emergency procedures in [WAC 173-303-201](#).

(2) 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.

**FROM:** Paul W. Martin

**DATE:** 2/25/2021

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**PG:** 2

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