

<u>SUBJECT</u>		<u>DATE</u>
1448.	Definitions of Inactive Portion, Active Portion and Closed Portion of a RCRA TSDF	AUG 12, 2021
1449.	Dangerous Waste Designations and Dangerous Waste Code Determinations	AUG 19, 2021
1450.	Method Detection Limits and Hazardous Waste Determinations	ENCORE AUG 26, 2021
1451.	Method Detection Limits and Hazardous Waste Determinations II	ENCORE SEP 2, 2021
1452.	Totals Analysis vs. TCLP and Dividing by 20	ENCORE SEP 9, 2021
1453.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE SEP 16, 2021
1454.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE SEP 23, 2021
1455.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE SEP 30, 2021
1456.	The "Derived from Rule", the "Mixtures Rule", and the "Contained-In Policy"	ENCORE OCT 7, 2021
1457.	Hazardous Debris and Options to Exclude as a Dangerous Waste	OCT 14, 2021
1458.	Regulatory Status of Characteristic Baghouse Dust Destined for Reclamation	OCT 21, 2021
1459.	RCRA Point of Generation and Baghouse Dust Collection Systems	OCT 28, 2021
1460.	Pumps Containing Liquid Hazardous Wastes and Liquids in Landfill Prohibition	ENCORE NOV 4, 2021
1461.	Pumps Containing Liquid Hazardous Waste and Land Disposal Restrictions	ENCORE NOV 11, 2021
1462.	Pumps Containing Liquid Hazardous Wastes and RCRA Empty Containers	NOV 18, 2021
1463.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE NOV 23, 2021
1464.	LDR Notifications/Certifications and Generator Permitted Treatment, Storage, or Disposal Facility	ENCORE DEC 2, 2021
1465.	Multiple Characteristic and Listed Hazardous Waste Codes and the "in lieu of" LDR Principle	ENCORE DEC 9, 2021
1466.	Universal Wastes - Recycling versus Disposal	ENCORE DEC 16, 2021
1467.	'Twas the Night Before Christmas – The Twenty-Eighth Edition	DEC 24, 2021
1468.	Spent Lead Acid Batteries vs., Universal Wastes	ENCORE DEC 30, 2021
1469.	Hazardous Debris and Radioactively Contaminated Cadmium Batteries	ENCORE JAN 6, 2022
1470.	Hazardous Debris and Radioactively Contaminated Lead-Acid Batteries	ENCORE JAN 13, 2022
1471.	Mercury Wet Cell Batteries - Debris or Not Debris	ENCORE JAN 20, 2022
1472.	Hazardous Debris and Non-Radioactive Lead Acid Batteries	ENCORE JAN 27, 2022
1473.	Hazardous Debris and LDR High/Low Mercury Subcategories	ENCORE FEB 3, 2022
1474.	Central Accumulation Areas and the ≤90-day Time Frame	ENCORE FEB 10, 2022
1475.	Central Accumulation Areas with Satellite Accumulation	FEB 17, 2022
1476.	Definition of RCRA Empty Tank	ENCORE FEB 24, 2022
1477.	RCRA Empty Acutely Hazardous Waste Containers	ENCORE MAR 3, 2022
1478.	The RCRA Definition of Acute Hazardous Waste	MAR 10, 2022
1479.	Regulatory Status of Liquids and Solids Separated from D001 High TOC Wastes	ENCORE MAR 17, 2022
1480.	Generator Accumulation at a Permitted Storage Facility	MAR 24, 2022
1481.	Generator Accumulation and Maximum Inventory of Dangerous Waste Onsite at a RCRA TSD	MAR 31, 2022
1482.	LDR Storage Prohibitions and the One-Year Rule	ENCORE APR 7, 2022
1483.	LDR Storage Prohibitions and Treated Hazardous Wastes	ENCORE APR 14, 2022
1484.	LDR Storage Prohibitions and Treated Hazardous Debris or Contaminated Soil	ENCORE APR 21, 2022
1485.	Satellite Accumulation, the Three-Day Rule, and Washington State vs. EPA	ENCORE APR 28, 2022
1486.	Satellite Accumulation Areas and the Three-Day Accumulation Time Limit	ENCORE MAY 5, 2022

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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 AREAS AND THE THREE-DAY ACCUMULATION TIME LIMIT

DATE: MAY 5, 2022

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TWO MINUTE TRAINING

SUBJECT: Satellite Accumulation Areas and the Three-Day Accumulation Time Limit

Q: A customer has a 55-gallon container at a satellite accumulation area (SAA) near a new process line. The process generating the waste will fill an SAA container about every 5 days. The process is continuous, and the customer is concerned that when the SAA container is full, the process will have to be shut down until the full SAA container is moved to the onsite ≤90-day central accumulation area (CAA) or an interim status or permitted treatment, storage or disposal area (TSD). What is our customer to do?

A: Per [WAC 173-303-174\(1\)](#) [[40 CFR 262.15](#)], a generator may accumulate as much as 55 gallons of dangerous waste or 1 quart of liquid acutely hazardous wastes or 2.2 pounds of solid acutely hazardous waste in containers at or near any point of generation where wastes initially may accumulate. The SAA 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. Compliance with permit or CAA requirements is not required provided the satellite container is – among other things:

- In good condition;
- Compatible with the waste;
- Kept closed except when adding or removing wastes;
- Marked as “Dangerous Waste” or “Hazardous Wastes”, and;
- Marked with the applicable hazard label(s) – e.g., Ignitable, Corrosive, Reactive and/or Toxic.

If the generator accumulates more than 55 gallons of dangerous waste or 1 quart/2.2 lbs., of acutely hazardous waste, the full SAA container must be marked with the date the accumulation limit was met. Then the generator must move the full SAA container within 3 calendar days to an onsite CAA or an onsite or offsite TSD.

The regulations do not prohibit adding dangerous waste to a new SAA container once the current SAA has been filled. The new SAA container may begin accumulating dangerous waste during the 3-day period that the full SAA container is awaiting transfer to the customer’s CAA or a TSD. Once the full drum arrives at the designated container storage area, the waste is managed according to the applicable central accumulation or TSD storage area requirements. Note as we learned in last week’s 2MT, the CAA 90-day accumulation limit begins in WA State when the SAA container is filled and not when the SAA container arrives at the CAA, as is the case in normal States. See [WAC 173-303-200\(2\)\(b\)\(iii\)](#).

Therefore, the customer does not have to shut down the process pending removal of the full SAA container. The full SAA container would be dated and moved within three days to the customer’s onsite central accumulation area or a designated onsite or offsite TSD. The generating process could continue to operate and begin accumulating dangerous/hazardous waste in the new SAA container. Technically, there is no container limit on how many SAA containers could be awaiting transfer to the designated accumulation or storage area, as long as the generator transfers the SAA containers within their respective 3-day time limits.

SUMMARY:

- An SAA can accumulate up to 55 gallons of dangerous waste or 1 quart/2.2 lbs., of acutely hazardous wastes.
- Once the SAA volume accumulation limit is met, the generator must date the full SAA container and within 3 days transfer the full SAA container to the designated central accumulation area or TSD.
- A new SAA container may begin accumulating wastes during the 3-day period the full SAA drum is awaiting transfer.

Excerpts from WAC 173-303-174(1) and WAC 173-303-200(2)(b) [*No 40 CFR equivalent*] 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: 5/5/2022

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Satellite Accumulation Areas and the Three-Day Accumulation Time 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. If a container holding dangerous waste is not in good condition (e.g., severe corroding or rusting or flaking or scaling, and/or apparent structural defects) or if it begins to leak, the generator must transfer the dangerous waste to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area operated in compliance with WAC 173-303-172 or 173-303-200, as applicable. In addition, the generator must address leaks and spills in accordance with the applicable provisions of WAC 173-303-145, 173-303-172, and 173-303-201.

(b) Compatibility of waste with containers. The generator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the dangerous waste to be stored, so that the ability of the container to contain the waste is not impaired.

(c) Management of containers.

(i) A container holding dangerous waste must be closed at all times, except:

(A) When it is necessary to add or remove waste; or

(B) When temporary venting of a container is necessary, such as:

(I) For the proper operation of equipment; or

(II) To prevent dangerous situations, such as build-up of extreme pressure.

(ii) A container holding dangerous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

(d) Special requirements for reactive waste. Containers holding reactive waste exhibiting a characteristic specified in WAC 173-303-090 (7)(a)(vi) through (viii) must be stored in a manner equivalent to the separation distances for storage of explosives in the International Fire Code, 2015 edition, or the version adopted by the local fire district.

(e) Special requirements for incompatible wastes.

(i) Incompatible wastes, or incompatible wastes and materials must not be placed in the same container, unless WAC 173-303-395 (1)(b) is complied with.

(ii) Dangerous waste must not be placed in an unwashed container that previously held an incompatible waste or material.

(iii) A storage container holding a dangerous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device. Containment systems for incompatible wastes must be separate.

FROM: Paul W. Martin

DATE: 5/5/2022

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: Satellite Accumulation Areas and the Three-Day Accumulation Time Limit

(f) Container labeling or marking. A generator must clearly label or mark each container of dangerous waste with the following:

(i) The words "Dangerous Waste" or "Hazardous Waste." Except for containers one gallon (or four liters) and under, the lettering must be legible from a distance of twenty-five feet or the lettering size is a minimum of one-half inch in height.

(ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable dangerous waste characteristic(s) and criteria of ignitable, corrosive, reactive and toxic and the applicable hazard(s) identified for listed dangerous wastes). The label or marking must be:

(A) Legible and/or recognizable from a distance of twenty-five feet or the lettering size is a minimum of one-half inch in height; and

(B) Include descriptive word(s) and/or pictogram(s) that identifies the hazards associated with the contents of the containers for the public, emergency response personnel, and employees; for containers one gallon (or four liters) and under the label, marking or lettering can be appropriate for the size of the container.

(g) Accumulation limits. When the accumulation limits listed in this subsection are met:

(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.

WAC 173-303-200 Conditions for exemption for a large quantity generator that accumulates dangerous waste.

Large quantity generators, not to include transporters as referenced in WAC 173-303-240(3), may accumulate dangerous waste on site without a permit or interim status, and without complying with the requirements of WAC 173-303-600 provided that all of the following conditions for exemption listed in this section are met.

(2) Accumulation time limit.

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

(i) The generator first generates a dangerous waste; or

(ii) 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

(iii) The generator exceeds its satellite accumulation limits prescribed in WAC 173-303-174(1).