

<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
1425. PCB Wastes and RCRA Hazardous Waste Characteristics D018 through D043	ENCORE	MAR 4, 2021
1426. PCB Containers and Empty Requirements	ENCORE	MAR 11, 2021
1427. PCB Containers and Empty Requirements II	ENCORE	MAR 18, 2021
1428. PCB Containers and Decontamination Requirements	ENCORE	MAR 25, 2021
1429. F002, Methylene Chloride and Coffee Decaffeination	APRIL FOOL'S	APR 1, 2021
1430. Central Accumulation Area – Location and Total Number		APR 8, 2021
1431. Satellite Accumulation Area Container and Temporary Central Accumulation		APR 15, 2021
1432. Satellite Accumulation and "At or Near"	ENCORE	APR 22, 2021
1433. Generators and Waste Analysis Plans		APR 29, 2021
1434. RCRA TSDFs Operating Record Requirements	ENCORE	MAY 6, 2021
1435. Operating Records Not Referenced in the "Operating Record" Regulations	ENCORE	MAY 13, 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: OPERATING RECORDS NOT REFERENCED IN THE "OPERATING RECORD" REGULATIONS

DATE: MAY 13, 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 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

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TWO MINUTE TRAINING

SUBJECT: Operating Records Not Referenced in the “Operating Record” Regulations

Q: In last week’s Two Minute Training, we discussed what specific types of records and information must be maintained in the facility’s “operating record”. [WAC 173-303-380](#), “Facility recordkeeping” and the equivalent Federal regulations at 40 CFR [264.73/ 265.73](#), “Operating record” detail the types of materials required in the operating record. Are the references to these specific types of materials all-inclusive, or are there other references outside of the operating record regulations?

A: Yes there are!

A search for the term “operating record” in the [40 CFR 265](#) interim status regulations revealed several instances of documents and information that must be maintained in the operating record such as:

- Documentation if State or local authorities decline to enter into preparedness and prevention arrangements or agreements;
- Use of alternate tank inspection schedules;
- Information if food chain crops are grown on land treatment facilities;
- Documentation of [Subpart AA](#) compliance under 40 CFR parts 60, 61, or 63;
- Implementation schedules to install Subpart AA closed-vent systems;
- Information concerning [Subpart BB](#) equipment, location, type, compliance method, etc.;
- Documentation of [Subpart CC](#) air emission control equipment design.

So even though not specifically referenced as operating records in the interim status regulations at 40 CFR 265.73, these documents and information are referenced elsewhere in 40 CFR 265 as operating records and hence must be available for inspection by State and Federal agencies.

SUMMARY:

- WAC 173-303-380 and 40 CFR 264/265.73 specifically detail operating record requirements.
- WAC and the 40 CFR regulations also reference operating records in other parts of the regulations.
- All records, documents, and information noted as operating records must be maintained in the operating record and available for inspection by State and Federal agencies.

Excerpts of operating records from 40 CFR 265, but not referenced in 40 CFR 265.73 are attached to the e-mail. If you have any questions, please contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 5/13/2021

FILE: 2MT\2021\051321.rtf

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Operating Records Not Referenced in the “Operating Record” Regulations

40 CFR Subpart C Preparedness and Prevention

40 CFR Part 265.37 Arrangements with local authorities

(b) Where State or local authorities decline to enter into such arrangements, the owner or operator must document the refusal in the **operating record**.

40 CFR Subpart J Tank Systems

40 CFR Part 265.195 Inspections

(c) Owners or operators of tank systems that either use leak detection equipment to alert facility personnel to leaks, or implement established workplace practices to ensure leaks are promptly identified, must inspect at least weekly those areas described in paragraphs (b)(1) through (3) of this section. **Use of the alternate inspection schedule must be documented in the facility's operating record.** This documentation must include a description of the established workplace practices at the facility.

40 CFR Subpart M Land Treatment

40 CFR Part 265.276 Food chain crops

(c)

(2)

(iv) Future property owners are notified by a stipulation in the land record or property deed which states that the property has received waste at high cadmium application rates and that food chain crops must not be grown except in compliance with paragraph (c)(2) of this section.

[Comment: As required by §265.73, if an owner or operator grows food chain crops on his land treatment facility, he must place the information developed in this section in the operating record of the facility.]

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Operating Records Not Referenced in the “Operating Record” Regulations

40 CFR Subpart AA - Air Emission Standards for Process Vents

40 CFR Part 265.1030

(d) The requirements of this subpart do not apply to the process vents at a facility where the facility owner or operator certifies that all of the process vents that would otherwise be subject to this subpart are equipped with and operating air emission controls in accordance with the process vent requirements of an applicable Clean Air Act regulation codified under 40 CFR part 60, part 61, or part 63. The documentation of compliance under regulations at 40 CFR part 60, part 61, or part 63 shall be kept with, or made readily available with, the facility **operating record**.

40 CFR Part 265.1035 Recordkeeping requirements

(b) Owners and operators must record the following information in the facility **operating record**:

(1) For facilities that comply with the provisions of §265.1033(a)(2), an implementation schedule that includes dates by which the closed-vent system and control device will be installed and in operation. The schedule must also include a rationale of why the installation cannot be completed at an earlier date. The implementation schedule must be in the facility **operating record** by the effective date that the facility becomes subject to the provisions of this subpart.

40 CFR Subpart BB - Air Emission Standards for Equipment Leaks

40 CFR Part 265.1064 Recordkeeping requirements

(b) Owners and operators must record the following information in the facility **operating record**:

(1) For each piece of equipment to which subpart BB of part 265 applies:

- (i) Equipment identification number and hazardous waste management unit identification.
- (ii) Approximate locations within the facility (e.g., identify the hazardous waste management unit on a facility plot plan).
- (iii) Type of equipment (e.g., a pump or pipeline valve).
- (iv) Percent-by-weight total organics in the hazardous waste stream at the equipment.
- (v) Hazardous waste state at the equipment (e.g., gas/vapor or liquid).
- (vi) Method of compliance with the standard (e.g., “monthly leak detection and repair” or “equipped with dual mechanical seals”).