

<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
1436. RCRA Generators Operating Record Requirements		MAY 20, 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: RCRA GENERATORS OPERATING RECORD REQUIREMENTS

DATE: MAY 20, 2021

<u>CPCCo Projects</u>	<u>CPCCo Functionals</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 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 Leah Hare Steve Heninger John Hultman 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 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 Skoglie Lana Strickling Greg Sullivan	(TBD) <u>DOE RL, ORP, WIPP</u> Duane Carter Al Farabee Tony McKarns	Bill Bachmann Dean Baker Scott Baker Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Rob Gregory James Hamilton Andy Hobbs Stephanie Johansen 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 Robin Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: RCRA Generators Operating Record Requirements

Q: Over the past two weeks of Two Minute Trainings (2MTs), it is fairly clear that a Treatment, Storage or Disposal Facility (TSDF) must maintain an operating record since the term is specifically referenced in the TSDF regulations at [WAC 173-303-380\(1\)](#), "Operating record" [40 CFR 264/265.73]. But what about generators, are generators also required to maintain a RCRA operating record?

A: The [WAC 173-303](#) and [40 CFR 262](#) generator regulations do not specify the term "operating record" in their respective table of contents. However, a word search for the term "operating record" indicates several references that stipulate information that a generator must maintain in their operating record. Examples include:

- [WAC 173-303-200\(6\)\(c\)\(i\)](#) [[40 CFR 262.17\(a\)\(4\)\(i\)](#)] – the certification from an independent qualified registered professional engineer for the generator's containment building;
- [WAC 173-303-200\(12\)\(a\)\(i\)](#) [[40 CFR 262.17\(a\)\(8\)](#)] – the closure notice for containers, tanks, drip pads and containment buildings;
- [WAC 173-303-201\(7\)\(e\)](#) [[40 CFR 262.256\(b\)](#)] – documentation when local authorities decline contingency plan arrangements;
- [WAC 173-303-201\(17\)\(k\)](#) [[40 CFR 262.265\(i\)](#)] – documentation of event details when the contingency plan is implemented;
- [WAC 173-303-395\(1\)\(d\)](#) [[WA State Only](#)] – documentation for the annual ignitable or reactive waste inspections;
- And any documentation that the regulations specify the generator must maintain at their site, e.g., manifests, annual/biennial reports, exception reports, waste designations/determinations.

Therefore, generators must maintain an operating record for hazardous waste/dangerous waste information, which includes records, documents, correspondence, and other information that documents compliance with the hazardous/dangerous waste regulations. Generators must maintain this information in accordance with the timeframes stated in the regulations.

SUMMARY:

- Similar to a TSDF operating record, generators are also subject to maintaining an operating record.
- A search of the generator regulations for the term "operating record" indicates several specific references.
- Generators must maintain information in the operating record that documents compliance with the hazardous/dangerous waste regulations and in accordance with stated timeframes.

Nothing is attached to the e-mail. If you have any questions, contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 5/20/2021

FILE: 2MT\2021\052021.rtf

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