

<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
1487. Satellite Accumulation Areas and the Three-Day vs., the 72-Hour Accumulation Time Limit		MAY 12, 2022
1488. RCRA and New Point of Generation	ENCORE	MAY 19, 2022
1489. High Mercury vs. Low Mercury and Point of Generation	ENCORE	MAY 26, 2022
1490. Nonwastewater vs., Wastewater – The LDR Definitions		JUN 2, 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:** NONWASTEWATER VS., WASTEWATER – THE LDR DEFINITIONS

**DATE:** JUNE 2, 2022

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## TWO MINUTE TRAINING

**SUBJECT:** Nonwastewater vs., Wastewater – The LDR Definitions

**Q:** A customer is completing land disposal restrictions (LDR) notifications for three containers of hazardous waste inorganic acid (D002) and as required by [40 CFR 268.7](#), must identify whether the hazardous wastes meet the definition of a nonwastewater (NWW) or a wastewater (WW). The acid wastestreams vary slightly in composition for water content, total organic carbon (TOC) and total suspended solids (TSS). Compositions by weight are as follows:

Wastestream #1- 60% inorganic acid, 40% water, no TOC and no TSS  
Wastestream #2- 30% inorganic acid, 69% water, 1% TOC and no TSS  
Wastestream #3- 20% inorganic acid, 79% water, no TOC and 1% TSS

How does the customer complete the LDR notifications in terms of the LDR treatability categories as WW or NWW for these three wastestreams?

**A:** The treatability categories of NWW or WW determine which LDR treatment standards apply to each hazardous waste code. These treatment standards are based on the performance levels achievable by the Best Demonstrated Available Technology (BDAT) identified for each WW or NWW group. According to [40 CFR 268.2\(f\)](#), "Wastewaters" are defined as wastes that contain less than 1% by weight TOC and less than 1% by weight TSS. Then per 40 CFR 268.2(d), "Nonwastewaters" are defined as wastes that do not meet the definition of a wastewater.

Per these definitions, the customer would complete the LDR notification for WW or NWW as follows:

Wastestream #1 meets the WW definition since there is no TOC or TSS.  
Wastestream #2 meets the NWW definition since the TOC is greater than or equal to 1%.  
Wastestream #3 also meets the NWW definition since TSS is greater than or equal to 1%.

Note that water composition of the wastestreams is not a consideration when determining treatability group classifications as wastewater or nonwastewater - - strange, but true.

### SUMMARY:

- An LDR WW contains less than 1% by weight TOC and less than 1% by weight TSS.
- An LDR NWW contains  $\geq$  1% by weight TOC or  $\geq$  1% by weight TSS.
- Water composition is not a criterion in determining LDR WW or NWW classifications.

Excerpts from 40 CFR 268.2 concerning the definitions of land disposal, wastewater, and nonwastewater 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.

## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Nonwastewater vs., Wastewater – The LDR Definitions

### 40 CFR §268.2 Definitions applicable in this part

When used in this part (268) the following terms have the meanings given below:

(c) Land disposal means placement in or on the land, except in a corrective action management unit or staging pile, and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, salt dome formation, salt bed formation, underground mine or cave, or placement in a concrete vault, or bunker intended for disposal purposes.

(d) Nonwastewaters are wastes that do not meet the criteria for wastewaters in paragraph (f) of this section.

(f) Wastewaters are wastes that contain less than 1% by weight total organic carbon (TOC) and less than 1% by weight total suspended solids (TSS).