

<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
1437. Operating Record vs. Operating Log		MAY 27, 2021
1438. RCRA Hazard Labeling – A Random Scenario	ENCORE	JUN 3, 2021
1439. RCRA Treatment and the Two-Part Definition	ENCORE	JUN 10, 2021
1440. D002 Waste and Dilution as Adequate LDR Treatment	ENCORE	JUN 17, 2021
1441. Hazard Label Marking Requirements for Permitted TSDFs		JUN 24, 2021
1442. Keeping Satellite Accumulation Area Containers Closed – New vs., Obsolete Requirements		JUL 1, 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: KEEPING SATELLITE ACCUMULATION AREA CONTAINERS CLOSED – NEW VS., OBSOLETE REQUIREMENTS

DATE: JULY 1, 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 Bob Cathel Rene Catlow Richard Clinton Randal Fox Bailey Hardy Stuart Hildreth Sarah Horn Sasa Kosjerina Richard Lipinski Carlie Michaelis Stuart Mortensen Dave Richards Deborah Singleton Sean Sexton Dave Shea Phil Sheely Kat Thompson 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 Skogleie 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: Keeping Satellite Accumulation Area Containers Closed – New vs., Obsolete Requirements

- Q:** Concerning the relatively new [Generator Improvements Rule](#) (GIR) that was effective in Washington State on April 28, 2019, have the satellite accumulation area (SAA) requirements changed in terms of keeping an SAA closed except when adding or removing dangerous wastes?
- A:** Prior to the GIR, the obsolete WAC 173-303-200(2)(a) [[40 CFR 262.34\(c\)](#)] stated that an SAA had to meet, among other things, the obsolete WAC 173-303-630(5)(a) [[40 CFR 265.173\(a\)](#)], which stated that an SAA container holding dangerous waste must always be closed, except when it is necessary to add or remove waste. After the GIR, the new SAA regulation at [WAC 173-303-174\(1\)\(c\)](#) [[40 CFR 262.15](#)] stated that an SAA container holding dangerous waste must be closed at all times, except:
- When it is necessary to add or remove waste; or
 - *When temporary venting of a container is necessary, such as for the proper operation of equipment; or to prevent dangerous situations, such as build-up of extreme pressure.*

An example situation for the new exception is when temporary venting of the SAA container is necessary for proper operation, e.g., when waste is added to the SAA on a continuous basis. If an SAA was completely closed during continuous additions, the increase in volume would increase the internal pressure since the SAA would not be capable of venting. With the new exception, an SAA could be temporarily opened to allow for venting. As EPA stressed in the GIR Response to Comments Document ([Docket # EPA-HQ-RCRA-2012-0121](#)), on page 399, the exception is only allowed during equipment operation and is not a loophole to allow for internal evaporation of dangerous/hazardous waste.

Therefore, the SAA container closure requirements have changed since the implementation of the new GIR by adding an exception for temporary venting for proper operation of equipment or to prevent dangerous situations such as extreme pressure.

SUMMARY:

- Prior to the GIR, an SAA was required to be closed except when it was necessary to add or remove dangerous waste.
- After the GIR, a new exception was added for temporary venting for proper operation of equipment or to prevent dangerous situations.
- EPA stressed that the exception is not a loophole to allow for internal evaporation of dangerous wastes.

Excerpts from obsolete WAC 173-303-200(2), obsolete WAC 173-303-630(5), new WAC 173-303-174 and EPA's GIR Response to Comments are 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: 7/1/2021

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Keeping Satellite Accumulation Area Containers Closed – New vs., Obsolete Requirements

Prior to GIR

(Obsolete) WAC 173-303-200(2) Satellite accumulation.

(a) A generator may accumulate as much as fifty-five gallons of dangerous waste or one quart of 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 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. Satellite accumulation is allowed without a permit provided the generator:(i) Complies with WAC 173-303-630 (2), (4), (5) (a) and (b), (8)(a), and (9) (a) and (b); and(ii) Complies with subsection (1)(d) of this section.

(Obsolete) WAC 173-303-630(5) Management of containers.

(a) A container holding dangerous waste must always be closed, except when it is necessary to add or remove waste.

After the GIR

(New) 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:

(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.

FROM: Paul W. Martin

DATE: 7/1/2021

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Keeping Satellite Accumulation Area Containers Closed – New vs., Obsolete Requirements

Hazardous Waste Generator Improvements Final Rule
Response to Comments Document
Summaries and Responses
US EPA
October 4, 2016
Docket # EPA-HQ-RCRA-2012-0121

· Clarification and guidance as the proposed rule introduces vague loopholes in addition to increased flexibility (i.e. allowing open containers ‘for the proper operation of equipment’) (Commenters 217, 232, 235).

EPA Response: This flexibility has been in place since 2008 as part of the Academic Laboratories Rule (Subpart K) and we have not learned of any implementation problems associated with that provision. Nevertheless, we have strengthened the regulatory language to make clear that this exception to requiring closed containers was intended for temporary situations only. In the preamble to the proposed rule, we indicated that the requirement to keep the container closed applies when the danger passes (e.g., the contents cool), and when the equipment is not in operation. In response to commenters’ concerns, EPA is finalizing this provision, as proposed, with a minor addition. The regulatory language has been modified so that a container holding hazardous waste must be closed at all times during accumulation, except when adding, removing, or consolidating waste, or when *temporary* venting of a container is necessary (1) for the proper operation of equipment, or (2) to prevent dangerous situations, such as build-up of extreme pressure (emphasis added). EPA stresses it does not intend to create a loophole to the closed container requirement or to allow intentional evaporation of hazardous waste. Rather, the intent of the flexibility is to address the limited cases in which "strict adherence to the "container closure" requirements could substantially increase a risk of a hazardous waste incident rather than decrease it" (Commenter 232).