

<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
1443. Central Accumulation Areas and Signage Requirements	ENCORE	JUL 8, 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: CENTRAL ACCUMULATION AREAS AND SIGNAGE REQUIREMENTS

DATE: JULY 8, 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>
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TWO MINUTE TRAINING

SUBJECT: Central Accumulation Areas and Signage Requirements

Q: A customer in Washington state is designing a central accumulation area (CAA - formerly known as a ≤90-day accumulation area) for ignitable and reactive dangerous wastes. The customer wants to post signs stating, “Central Accumulation Area”, “Danger - Unauthorized Personnel Keep Out” and “No Smoking”. For a CAA, which signs are required and which signs, if any, are optional?

A: Per [WAC 173-303-200\(3\)\(f\)\(iii\)](#) [[40 CFR 262.17](#)], it basically states that a generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes. One of those precautions is for the generator to post conspicuously, “No Smoking” signs wherever there is a hazard from ignitable or reactive wastes.

Concerning “Danger – Unauthorized Personnel Keep Out” signs, per [WAC 173-303-200\(7\)\(c\)](#), the Washington Department of Ecology “may also require” that danger signs or an equivalent legend, be posted at each entrance to the CAA. Since the regulation states that the department may require signs to be posted, the danger sign is not a requirement unless the department specifies the posting.

A review of [40 CFR 262](#) revealed no parallel requirement at the Federal level for “Danger – Unauthorized Personnel Keep Out” signs. Also, there was no Washington state or Federal requirement to post a “Central Accumulation Area” sign.

Therefore, the customer would be required to post the “No Smoking” sign. The danger sign may be required by the Washington State Department of Ecology, but would not be required at the Federal level. The CAA sign would also not be required. Note that the generator could post both the danger and CAA signs as best management practices since regulations do not prohibit additional signs.

SUMMARY:

- “No Smoking” signs are required at CAAs accumulating ignitable or reactive wastes.
- “Danger – Unauthorized Personnel Keep Out” may be required at CAAs in Washington state and are not required at the Federal level.
- “Central Accumulation Area” signs are not required but can be a best management practice.

Excerpts from [WAC 173-303-200\(3\)](#), [40 CFR 262.17](#) and [WAC 173-303-200\(7\)](#) 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: 7/8/2021

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Central Accumulation Areas and Signage Requirements

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.

(3) Accumulation of waste in containers.

(f) Special requirements for ignitable or reactive waste.

(iii) The generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including, but not limited to, the following: Frictional heat, sparks (static, electrical, or mechanical), and radiant heat. While ignitable or reactive waste is being handled, the generator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously place wherever there is a hazard from ignitable or reactive waste.

(7) Labeling and marking of containers and tanks.

(c) The department may also require that a sign be posted at each entrance to the accumulation area, bearing the legend, "danger - unauthorized personnel keep out," or an equivalent legend, written in English, and legible from a distance twenty-five feet or more.

40 CFR §262.17 Conditions for exemption for a large quantity generator that accumulates hazardous waste

A large quantity generator may accumulate hazardous waste on site without a permit or interim status, and without complying with the requirements of parts 124, 264 through 267, and 270 of this chapter, or the notification requirements of section 3010 of RCRA, provided that all of the following conditions for exemption are met:

(a) *Accumulation.* A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in paragraphs (b) through (e) of this section. The following accumulation conditions also apply:

(1) *Accumulation of hazardous waste in containers.* If the hazardous waste is placed in containers, the large quantity generator must comply with the following:

(vi) *Special conditions for accumulation of ignitable and reactive wastes.*

(B) The large quantity generator must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction including but not limited to the following: Open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (*e.g.*, from heat-producing chemical reactions), and radiant heat. While ignitable or reactive waste is being handled, the large quantity generator must confine smoking and open flame to specially designated locations. "No Smoking" signs must be conspicuously placed wherever there is a hazard from ignitable or reactive waste.