

<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
1444. Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	JUL 15, 2021
1445. Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	JUL 22, 2021
1446. TSDF Written Notice to the Generator of Appropriate Permits - Recordkeeping Requirements		JUL 29, 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: TSDF WRITTEN NOTICE TO THE GENERATOR OF APPROPRIATE PERMITS -
RECORDKEEPING REQUIREMENTS

DATE: JULY 29, 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 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: TSDF Written Notice to the Generator of Appropriate Permits - Recordkeeping Requirements

Q: [WAC 173-303-290](#), "Required notices", [[40 CFR 264.12\(b\)](#)] states the "owner or operator of a facility that receives dangerous waste from an off-site source (except where the owner or operator is also the generator) must inform the generator in writing that they have the appropriate permit(s) for, and will accept, the waste the generator is shipping. The treatment, storage or disposal facility (TSDF) owner/operator must keep a copy of this written notice as part of the operating record required under [WAC 173-303-380\(1\)](#)" [[40 CFR 264.73](#)]. Is the generator required to request the notification and is the generator also required to keep a copy of the notice in their operating record?

A: A review of [WAC 173-303-200](#), "Conditions for exemption for a large quantity generator that accumulates dangerous waste", [[40 CFR 262](#)] revealed no corresponding generator regulations related to a TSDF written notice of appropriate permits and agreement to accept the generator's dangerous waste. Without a generator equivalent regulation, there are no drivers to maintain the notice in the generator's operating record.

As further clarification, an EPA RCRA/Superfund Hotline Monthly Summary ([RO 12121](#)) dated July 1983, addressed the question of whether the generator must request a copy of the TSDF notice. EPA's response was no, the generator is not required to ask for or receive a written notice from the TSDF. The generator is required to send the waste to a permitted TSDF according to [40 CFR 262.20\(b\)](#). However, EPA did state that the notice would assure the generator that the hazardous waste is being sent to a permitted TSDF with the appropriate permits and that the TSDF has agreed to accept the generator's wastes.

Therefore, the TSDF is required to provide a written notice that the TSDF has the appropriate permits and will accept the generator's waste. The generator is not required by regulation to request the notice or keep a copy in the generator's operating record; however, the notice could assure the generator that the TSDF has the appropriate permits and agrees to accept the generator's waste.

SUMMARY:

- A TSDF is required to inform the generator in writing that the TSDF has the appropriate permits and will accept the generator's hazardous waste.
- The TSDF must maintain a copy of the written notice in their operating record.
- The generator is not required to request the written notice from the TSDF or keep a copy of the notice in their operating record.

Excerpts from WAC 173-303-290, 40 CFR 264.12, 40 CFR 262.20 and the EPA RCRA Summary area 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: 7/29/2021

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: TSDF Written Notice to the Generator of Appropriate Permits - Recordkeeping Requirements

WAC 173-303-290 Required notices.

(3) The owner or operator of a facility that receives dangerous waste from an off-site source (except where the owner or operator is also the generator) must inform the generator in writing that they have the appropriate permit(s) for, and will accept, the waste the generator is shipping. The owner or operator must keep a copy of this written notice as part of the operating record required under WAC 173-303-380(1).

40 CFR §264.12 Required notices

(b) The owner or operator of a facility that receives hazardous waste from an off-site source (except where the owner or operator is also the generator) must inform the generator in writing that he has the appropriate permit(s) for, and will accept, the waste the generator is shipping. The owner or operator must keep a copy of this written notice as part of the operating record.

40 CFR §262.20 General requirements

(b) A generator must designate on the manifest one facility which is permitted to handle the waste described on the manifest.

RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

RO 12121

JULY 83

9472.1983(02)

40CFR 264.12(b) requires the owner/operator of a hazardous waste management facility to inform a generator in writing that the facility has the appropriate permit(s) for and will accept a generator's wastes. Is a generator required to receive this written notice prior to transport?

No, 40CFR 262.20(b) states that wastes transported offsite must be sent to a facility permitted to handle that waste; a generator is not required to ask for or receive a written notice from the facility owner/operator. However, a written notice would assure the generator that he is in compliance with 40 CFR 262.20(b). A written notice would also avoid the potential problems of a generator sending waste to a facility which has the proper permits but which has not agreed to accept the waste.

Source: Rolf Hill

FROM: Paul W. Martin

DATE: 7/29/2021

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