

<u>SUBJECT</u>		<u>DATE</u>
1501. RCRA Empty Containers and The Debris Rule	ENCORE	AUG 25, 2022
1502. Exceptions to Free Liquids in Landfills Prohibition	ENCORE	SEP 1, 2022
1503. Dust Suppression in Landfills using Nonhazardous Liquids	ENCORE	SEP 8, 2022
1504. Treated Hazardous Wastes Used as Dust Suppressant	ENCORE	SEP 15, 2022
1505. LDR One-Year Storage Prohibition and Generator Permitted Storage	ENCORE	SEP 22, 2022
1506. LDR Notifications and Generator Permitted Storage	ENCORE	SEP 29, 2022

Approved for Public Release;
Further Dissemination Unlimited

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING

TO: CENTRAL PLATEAU CLEANUP COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CPCCo Environmental Protection, Hanford, WA

SUBJECT: LDR NOTIFICATIONS AND GENERATOR PERMITTED STORAGE

DATE: SEPTEMBER 29, 2022

<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>
Janine Baker	Sara Austin	Brett Barnes	Dean Baker	Bill Bachmann	Dan Saueressig
Tania Bates	Jeff Bramson	Curt Clement	Linda Conlin	Scott Baker	Lana Strickling
Theresa Boles	Bob Bullock	Mike Demiter	Bailey Hardy	Michael Carlson	Joelle Moss
Justin Bolles	Frank Carleo	Jerry Cammann	Garrett Knutson	Peter Ceton	Greg Varljen
James Brack	Bob Cathel	Kelly Elsethagen	Eric Van Mason	Danielle Collins	Julie Waddoups
Rene Catlow	Stacy Cutter	Garin Erickson	Melanie Myers	Paul Crane	Jeremy Wall
Richard Clinton	Jeanne Elkins	Katie Hall		Tina Crane	Jay Warwick
Patty Drago	Jonathan Fullmer	Dashia Vander Sys	<u>DOE RL, ORP, WIPP</u>	Ron Del Mar	Ted Wooley
Paul Fernandez	Randal Fox	Mark Kamberg	Duane Carter	John Dorian	
Ryan Fisher	Alison Greene	Jon McKibben	Ingrid Colton	Mark Ellefson	
Andrew Getz	Sarah Horn	Saul Martinez	Tashina Jasso	Darrin Faulk	
Cory Grabeel	John Hultman	Matt Mills	Tony McKarns	Kip George	
Lawanda Grow	Julie Johanson	Carly Nelson	Adolfo Perez	James Hamilton	
Char Hall	Mitch Marrott	Eric Pennala	Bryan Trimberger	Leah Hare	
Stuart Hildreth	Morgan Matson	Jon Perry	Robin Varljen	Andy Hobbs	
Aprill Jivelekas	Stewart McMahand	Dave Richards	Allison Wright	Stephanie Johansen	
Sasa Kosjerina	Carlie Michaelis	Deanna Rohlfing		Ryan Johnson	
William Krueger	Brian Mitcheltree	Christian Seavoy		Mike Lowery	
Richard Lipinski	Anthony Nagel	David Shaw		Michael Madison	
Stuart Mortensen	Chris Plager	John Skoglie		Terri Mars	
Edward Myers	Linda Petersen	Greg Sullivan		Steve Metzger	
Trey Reppe	Brent Porter			Tony Miskho	
Melissa Sahn-dame	Sean Sexton			Tom Moon	
Seth Slater	Dave Shea			Chuck Mulkey	
Phil Sheely	Deborah Singleton			Michelle Oates	
Kat Thompson	Dale Snyder			Kirk Peterson	
Jeff Westcott	Britt Wilkins			Jeremy Rishel	
Richard Willson	Jennifer Williams				
Nick Wood					
Jon Wright					

Approved for Public Release;
Further Dissemination Unlimited

DISCLAIMER - "Two Minute Training" ("2MT") is a peer-to-peer communication, presented to share the benefit of the author's work experience with other professionals, who can independently evaluate his analysis. 2MT does not necessarily reflect the opinions, conclusions or policies of the author's past or current employers or the US Department of Energy. The author's employers do not take any responsibility for the accuracy of its conclusions. 2MT is not intended to be used as authoritative guidance or direction by any person or entity. Anyone transmitting or reproducing it is prohibited from modifying its content, this disclaimer, or other text, or republishing it independent of its original source.

TWO MINUTE TRAINING

SUBJECT: LDR Notifications and Generator Permitted Storage

Q: Last week's Two Minute Training ([2MT](#)), concerned the applicability of the land disposal restrictions (LDR) notification requirements for a generator's onsite storage facility. If a customer's company generates an LDR hazardous waste, and the waste is sent to the customer's onsite storage facility, must the customer send an LDR notice to themselves, formally notifying itself that the waste requires treatment prior to land disposal?

A: Per the [November 7, 1986, Federal Register](#) on page 40597, middle column, line 10, it basically states that a generator of a land disposal restricted hazardous waste must notify the treatment facility in writing of the appropriate LDR treatment standard for the waste. The Federal Register clarifies for generators who are also TSDFs:

"Generators who are also treatment, storage, and disposal facilities must place the same information in the operating record although a formal notification and manifest is not required."

Since a formal LDR notification is not required, the generator does not need to use a company prescribed form for the LDR notification. The generator need only maintain the elements of the LDR notification as required by [40 CFR 268.7](#)(a)(2), (3), (4) or (9), e.g.:

- EPA hazardous waste numbers,
- Constituents of concern for F001-F005 and F039,
- Underlying Hazardous Constituents (UHCs) in characteristic wastes,
- Nonwastewater/Wastewater category,
- Waste analysis data if available,
- A certification if the waste meets the treatment standard, etc.

This information can be maintained in one or various locations of the generator's operating record. Note that the onsite transportation of hazardous waste does not require a manifest and hence the manifest is not a required element of the onsite generator's LDR notification information.

Therefore, the customer would not need a formal LDR notification but would be required to maintain the elements of an LDR notification for any LDR hazardous waste generated and subsequently stored on their site.

SUMMARY:

- A generator can transfer LDR hazardous waste to their onsite storage facility.
- Even with onsite storage, the generator must have the LDR notification elements in the operating record as any generator would have when shipping LDR waste offsite - except a manifest.
- The LDR information could be in one or various locations of the generator's operating record.

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.