

<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	ENCORE DEC 2, 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: LDR NOTIFICATIONS/CERTIFICATIONS AND GENERATOR PERMITTED
TREATMENT, STORAGE OR DISPOSAL

DATE: DECEMBER 2, 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: LDR Notifications/Certifications and Generator Permitted Treatment, Storage, or Disposal

Q: A customer has generated Land Disposal Restricted (LDR) hazardous wastes and is accumulating the wastes in a Central Accumulation Area, i.e., a less-than-90-day area. The customer is aware of requirements for generators to provide LDR notices or certifications to RCRA Treatment, Storage, or Disposal Facilities (TSDFs) per the requirements at [40 CFR 268.7\(a\)\(2\), \(3\), \(4\), or \(9\)](#). What the customer is not sure about is whether an onsite generator must provide an LDR notice/certification to their own onsite TSDF. Are there any LDR notification/certification requirements for an onsite generator transferring their own LDR waste to their own onsite TSDF, i.e., does the generator need to send an LDR notice/certification to themselves?

A: Per the [November 7, 1986, Federal Register](#) on page 40597, it basically states that a generator of an LDR waste must notify the TSDF in writing of the appropriate LDR treatment standard for the waste. The Federal Register goes on to state:

“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 written LDR notification is not required, the generator must 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; nonwastewater/wastewater category; waste analysis data, if available; etc., in various locations of the generator’s/TSDF’s operating record. Note that the onsite transportation of LDR waste does not require a manifest and hence the manifest is not a required element of the onsite generator’s LDR notification/certification.

Therefore, the customer would not need to send a formal written LDR notification/certification but would be required to maintain the elements of an LDR notification/certification for any LDR hazardous waste generated and then managed at an onsite RCRA TSDF.

PS: An LDR notice/certification would not be required from the generator’s point of generation to the Central Accumulation Area since there are no requirements to notify a generator of LDR requirements.

SUMMARY:

- A generator can transfer LDR hazardous waste to their onsite RCRA TSDF.
- Even though the LDR waste is managed at an onsite TSDF, the generator must have the same LDR notification/certification elements in their operating record as any generator would have to maintain when shipping LDR waste offsite.
- Note that a manifest is not required element of the LDR notification/certification since an onsite shipment does not require a manifest.

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.

FROM: Paul W. Martin

DATE: 12/2/2021

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