



INTEROFFICE MEMORANDUM

DATE: July 2, 1996

TO: Distribution

FROM: Gary Konwinski, Environmental Manager, T130F, X2729

SUBJECT: ENVIRONMENTAL COMPLIANCE GUIDANCE - GRK-183-96

ACTION: None

Attached is the most recent environmental guidance document that has been prepared by Kaiser-Hill, Compliance and Performance Assurance. To date there are eleven environmental guidance documents that have been named. Eight documents are in final form, while document Nos. 7, 8, and 10 are in draft form and will be issued in the future. The currently issued environmental guidance documents are:

- 1 Spent incandescent bulbs to be collected for recycling
- 2 Aerosol can management plan - non regulated material
- 3 Management of spent circuit boards
- 4 Application of F003 waste code
- 5 Application of F039 waste code
- 6 Inspection of RCRA-regulated units that no longer store hazardous waste
- 7 Management of sources **In draft form**
- 8 Self-evaluation program **In draft form**
- 9 Requirements for the hazardous waste label
- 10 Requirement for generator to manage waste **In draft form**
- 11 Pending and containers not described parameters in the Waste Environmental Management System (WEMS)
- 12 Universal waste rule and aerosol cans

The environmental guidance documents are designed to assure operational consistency for the entire Site and should be consulted for information. I have a complete set of the guidance documents and will distribute them to meet your needs. If you need any or all of the guidance documents please contact me.

Initiation of the existing environmental guidance documents have come from the ideas of numerous individuals within the Kaiser-Hill team. If there is an operational or regulatory area that is in need of clarification, please forward your idea to me. I will present it to the Environmental Leadership Team for guidance consideration.

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Attachment:
as stated



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INTEROFFICE MEMORANDUM

DATE: June 11, 1996
TO: Distribution
FROM: Karan North, Compliance & Performance Assurance, Kaiser-Hill, Bldg. T130C, X9876 *KML for KN*
SUBJECT: ENVIRONMENTAL COMPLIANCE GUIDANCE NO. 12 - "UNIVERSAL WASTE
RULE AND AEROSOL CANS (5400.2) -KSN-111-96

Guidance

The Colorado Department of Public Health and Environment adopted the Universal Waste Rule and added aerosol cans to the list of waste which can be managed in this manner. Kaiser-Hill is requesting that Site personnel collect aerosol cans using the universal waste rule before the cans are punctured.

Requirements

The Universal Waste Rule for aerosol cans became effective at the State level on March 1, 1996 and is defined in 6 CCR 1007-3, Part 273. By adopting this rule the State hopes to encourage recycling, reduce the amount of hazardous waste in municipal landfills and improve implementation of the hazardous waste program. The Site would be a small quantity universal waste handler which accumulates less than 5,000 kilograms of universal waste at any time.

There are no notification requirements for a small quantity handler. However, there are several container and management requirements.

- 1) A small quantity handler can accumulate hazardous and non-hazardous aerosol cans together, as long as the waste in the collection area is compatible.
- 2) Each aerosol can must be marked or labeled with the date it became a waste or the date the can was received by the small quantity handler.
- 2) On the outside of the collection container, the words "Universal Waste - Aerosols" must be visible.
- 3) The collection container must also be marked with an accumulation date. This date is the date the first can was collected in the collection container. The aerosol cans may be collected for a period of no more than one year. Once the aerosol cans are punctured the one-year limit ends.
- 4) The collection containers should be tracked in the Waste Environmental Management System for inventory tracking.
- 5) Employees accumulating in a universal waste container must complete the annual RCRA training.
- 6) Prior to the one-year time limit, the small quantity handler must arrange to send the aerosol cans to a puncturing device.

- 7) Once received at the puncturing location, the cans must be punctured immediately. If there is any residual liquid in the punctured can, the liquid must be characterized and managed appropriately. If the liquid is characterized as RCRA-regulated hazardous waste, the liquid must be managed in a RCRA-regulated Accumulation Area.

By adopting this rule, the Site is able to collect aerosol cans in remote buildings for a period of one year, without complying with the rules for a Satellite Accumulation Area. If you have any questions, please contact Karen Lavorato on extension 6651 or digital pager 1372.

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