



Haz-Rad Reporter

Message from Doug Hansen, Director



In this issue:

Personnel Changes	– 2
Hazardous Waste Generator Training	– 4
Hazardous Waste Determination	– 4
myRCRAid	- 5
Ask Eleanor, SBEAP	– 6
Universal Waste	– 7
E-Cig/Vape Waste Disposal	– 7
Lithium-Ion Battery Safety	– 8
LLRW and EnergySolutions	– 9
TCLP vs Total analysis/Dry Weight	– 10
Hazardous Waste Pending Analysis	- 11
Hazardous Waste/Used Oil Mixture	- 11
Hazardous Waste TSDf Update	– 12
Point of Generation	– 13
Knowledge Based Determinations	– 13
Corrective Action '22 Accomplishments	– 14
Statewide Recycling Data Initiative	– 15
WMRC Email List	– 16

As we wrap up another very busy year, we're pleased to be able to share updates on some of the important work we continue to perform within the Division of Waste Management and Radiation Control. The State of Utah continues to experience significant growth and we have certainly seen the effects of that growth within the Division. The demands of managing increased workloads as the real estate market booms and manufacturing returns to pre-pandemic levels has been a challenge over the course of this year. The Department of Environmental Quality strives to embody these four values: Exceptional Service, Commitment to Employees, Credibility and Trust, and Continuous Improvement. While we are committed to all four values, I would like to expand on two of them.

First, credibility and trust. As you will be able to see in subsequent pages, we have lost over 150 years of combined experience in the past seven months. It is difficult to replace the kind of wisdom and knowledge that comes with years of service. However, you will also see that we have been able to hire new talent with a variety of background and experience. We remain committed to providing the necessary training to ensure that our new staff have all the relevant knowledge and skills to continue to meet the high standard of work we strive to provide. We also remain committed to engaging in outreach and collaborating with stakeholders across all our programs. As I committed to last year, we have continued to provide virtual options for participating in both direct and public meetings with the Division to ensure greater access for the regulated community and the public. We have also continued to provide in-person outreach to communities when that is helpful.

Second, continuous improvement. Our continuous improvement efforts run the gambit from minor adjustments to internal process and rules to more public-facing changes to our email subscriptions and online payment options. Our most significant continuous improvement project remains our effort to consolidate all our various program databases on a single platform that increases our ability to track projects, licenses, and permits as well as improve our capability to report the results of the work we do. Many of you will see some of the end products of this effort as more of our programs go live within the new database over the next year. We anticipate many process improvement opportunities as we have greater opportunity to analyze data. Self-evaluation remains a priority for the Division as we seek to do better today than we did yesterday and look to build for tomorrow.

As the season of gratitude is upon us, I can't help but express thanks for the many good things I experience living and working in this great state. I feel blessed to have access to recreation in our amazing mountains, desert basins, and red rock plateaus. I truly love Utah and feel weighty honor of serving the public here. I look forward to a new year and a new opportunity to work together to accomplish our goals of providing "Clean air, land and water for a healthy and prosperous Utah."

New Division Personnel



Sally Kaiser
Hazardous Waste



Paige Walton
Corrective Action



Wade Hess
Solid Waste



Amber Loveland
Solid Waste



Gerardo Rodriguez
Data Systems Analyst



Alek Nielsen
Support Staff



Sarah Dehnert
Solid Waste



Krystal Thomas
X-ray Inspector



Gage Fausto
LLRW



Craig Jorgensen
Hazardous Waste

Division Retirements



Brad Maulding is retiring at the end of December 2022, after almost 35 years of service to the Division of Waste Management and Radiation Control. Brad spent many years working in the Division's Hazardous Waste Facilities program before moving to his current position as Manager of the Corrective Action and RCRA Voluntary Clean up Section. In that role his team has successfully assisted with innumerable environmental investigation, site management, cleanup, and revitalization efforts for hazardous waste sites.

Brad is valued and respected by both Division personnel and our customers. His commitment, knowledge and expertise will be greatly missed. We wish him happiness and an abundance of relaxing days with good weather for fishing, biking, and skiing.

- Jalynn Knudsen



Michelle is retiring at the end of December 2022 after 23 years of service with the Department of Environmental Quality in the Division of Solid and Hazardous Waste/Division of Waste Management and Radiation Control. She has a Masters of Geology from the University of Utah. Go Utes! She started her career as white-water river guide, ski patrol, and an exploration geologist for eight years. During her 23 years with the Division, for 10 years she has performed oversight of our Federal Facilities and for 13 years she was a project lead for the Used Oil Section. One of her noteworthy career accomplishments was her work in the Chemical Demilitarization Section (Tooele Chemical Agent Disposal Facility (TOCDF) & Chemical Agent Munitions Disposal System (CAMDS)) where 42% of the nation's chemical weapons were safely destroyed here in Utah. Michelle's dedication to her work and willingness to help others will be sorely missed. We wish her the best, doing the things she loves; whitewater rafting, kayaking, camping, hiking, biking, and using her artistic talents sculpting, designing jewelry, welding etc. Enjoy Retirement!

- Deborah Ng



Roy Van Oss retired after 31 years with DEQ in May 2022. Roy spent the span of his career at DEQ in the solid waste program. His tenure allowed him to see the initial promulgation of state laws for solid waste, and ultimately, administrative rules to implement those laws. During his career, Roy expanded his education by achieving a PhD in chemical engineering. Around the office, Roy was known as one of the founders of lunchtime basketball games and for his constant supply and careful brewing of coffee to ensure that everyone was alert. In his retirement, Roy's co-workers expect that he will continue his many hobbies such as woodworking and welding, and he may likely be found in local farmer's markets, supporting his son's granola business that many other Division employees have had the chance to sample.

- Brian Speer



Tom Rushing worked for the Utah Department of Environmental Quality for 28 years. He began his employment with the Utah Division of Radiation Control (now Division of Waste Management and Radiation Control) in May 2007, after working as an Environmental Scientist III with the Utah Division of Water Quality for 13 years. Before that, he worked at the State of Utah Health Laboratory for two years. He received the 2012 Utah Department of Environmental Quality (DEQ) Hall of Fame award. He was an excellent team member and worked well with other professional disciplines in the Division. The inspections he performed and previous work experience in analytical chemistry and stormwater management helped improve operations at the licensees we regulate. He was an experienced and valuable member of the Division's Uranium Mills Section. He will be greatly missed.

- Phil Goble



Russ Topham worked as an engineer for over 33 years, including working for engineering consulting firms for 6 years (wastewater design and geotechnical services), local municipalities for 5 years, and with the DEQ (DDW & DWMRC) for 22 years. He received multiple Utah Department of Environmental Quality White Hat awards (1995, 1996, 1998) for customer service while previously employed at the DDW from 1992 - 2000. He has also received a number of United States Environmental Protection Agency (EPA) awards, including the EPA Region 8 Environmental Achievement Award (1998) and the Regional Administrator's Award (2000). He was an experienced and valuable member of the Division's Uranium Mills Section. He will be greatly missed.

- Phil Goble

**Congratulations to Craig Anderson,
Director of Environmental Health,
from the Utah Attorney General's
Office.**

**Mr. Anderson received the 2022
Energy, Natural Resources and
Environmental Law (ENREL)
Award for Distinguished Service**



2023 Hazardous Waste Generator Virtual Training

May 22-23, 2023



**Registration will be posted on our website in April!
Please Join Us!**



**KNOW THE
RULES !**

Hazardous Waste Determination



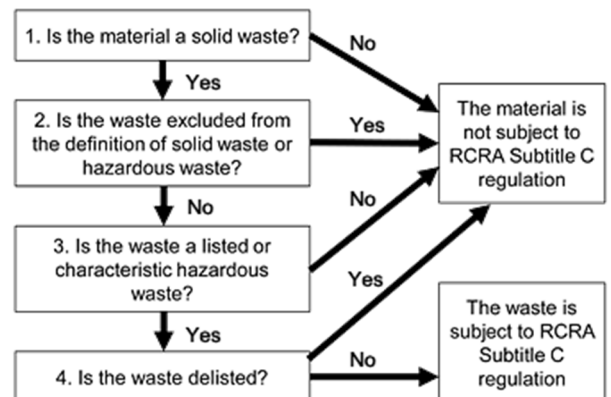
Whenever facilities are trying to make a hazardous waste determination for a particular material, they should be asking themselves the following questions in order:

1. Is it a solid waste? (R315-261-2)
2. Is it exempt? (R315-261-4)
3. Is it listed? (R315-261-31 through 33)
4. Is it characteristic? (R315-261-21 through 24)

If the material you're managing is being abandoned or is inherently waste-like, the material is a solid waste. Abandoned material includes material that is being thrown away, burned, incinerated, or disposed of.

Once you've ruled out any exclusions or exemptions, check to see if the waste meets any of the listing descriptions in RCRA regulations under R315-261-31 through 33 UAC. Finally, does the waste exhibit any of the four characteristics of ignitability, corrosivity, reactivity, and/or toxicity?

The Hazardous Waste Identification Process



The diagram included should help you walk through each step to help determine if your waste is a hazardous waste.

Make sure you document all exclusions or exemptions being claimed and document the knowledge and/or analyses used to make your waste determinations!



What Is myRCRAid?

- ❖ myRCRAid is a component of RCRAInfo developed by the EPA.
- ❖ myRCRAid allows generators, transporters, treatment, storage, and disposal facilities, and other hazardous waste handlers to submit EPA form 8700-12 electronically.
- ❖ This is especially important for Small and Very Small Quantity Generators, as they are now required to re-notify with the Division of Waste Management and Radiation Control every 4 years using the 8700-12 from.

For an information sheet on myRCRAid, click [here](#).
To register for a myRCRAid account, click the icon to the right.



30-Day Storage Extension Requests – R315-262-16(d) and R315-262-17(b) UAC

In August 2021, the EPA provided a memorandum regarding the temporary backlog of containerized hazardous waste needing incineration across the country. The EPA acknowledged in early June 2021 that some commercial hazardous waste incinerators were no longer accepting containerized hazardous waste from generators due to a backlog at their facilities. The EPA heard from over 20 states that they received requests from hazardous waste generators for extensions to the accumulation time limit, and some states were receiving requests for second extensions.



The Division of Waste Management and Radiation Control has created a [30-day Storage Extension Request Guidance document](#) and a [RCRA Hazardous Waste Storage Extension Application](#) for hazardous waste generators in an attempt to help address the burden on generators that currently have nowhere to send their hazardous waste while still ensuring that all hazardous waste in storage is being managed in a manner that maintains protection of human health and the environment.



ASK ELEANOR



SMALL BUSINESS ENVIRONMENTAL ASSISTANCE PROGRAM (SBEAP)

Hello. My name is Eleanor, and I am the DEQ Small Business Environmental Assistance Program Coordinator/Ombudsman. SBEAP is a free, confidential, and non-regulatory program designed to assist businesses with environmental permitting.

Let me know if you have questions about air, water, or hazardous waste permits. To contact me please call 801-536-0091 or email: edivver@utah.gov

The following is an example of a question I received.

Q1: *During the pandemic slowdown, our painting operation and associated metal fabrication small business were made aware that this process may generate regulated emissions and wastes requiring state and EPA permits. I know ignorance is no reason for disregarding the law, but is there a one-stop small business compliance resource where we can research these permits or seek help?*

A1: Small manufacturers and businesses that paint, use machines, clean or process metals, plastics, or other materials, often generate toxic emissions or hazardous wastes that may be harmful to both human health and the environment. Service industries such as auto body shops, dry cleaners and even dentists can generate regulated emissions, too. The National Small Business Environmental Assistance Program (SBEAP) operates a website that can serve as an initial one-stop environmental compliance resource for most small business manufacturers such as yourself.

Q2: *Also, how do we know if we are a Very Small Quantity Generator, and do we need a permit?*

A2: EPA defines **very small quantity generators** by: *Very small quantity generators (VSQGs), generate less than 100 kilograms (kg) or 220 pounds (lbs.) of hazardous waste per month (EPA). If you are a VSQG you do not need a permit.*

FYI: We have [best management practices handouts and a small business assistance guide](#) that can help you navigate next steps.

If you decide you need one-on-one assistance, reach out to Utah's SBEAP at edivver@utah.gov. State SBEAPs are designed to help you get into compliance; we specialize in helping businesses identify which rules or permits may apply to them.



Universal Waste



The universal waste program was established by the EPA on May 11, 1995. There are two primary goals of the universal waste program: Increase recycling and reduce illegal disposal of universal waste in municipal waste landfills and combustors. Universal wastes include batteries, lamps, mercury-containing equipment, pesticides, antifreeze, and aerosol cans. Requirements for Small and Large Quantity Generators are:

- Container labeling/marketing (ex. “Universal Waste – Batteries”).
- One year accumulation time limit.
- Must prevent releases of universal waste components to the environment.
- Employees must be informed of proper waste handling and emergency response.
- Large quantity generators must notify the Division of universal waste activity.
- Large quantity generators must keep waste tracking/recordkeeping.



E-Cigarette/Vape Waste Disposal

Did you know that E-cigarette/vape waste is a hazardous waste? Vapes contain nicotine and lithium-ion batteries. Nicotine is a listed acute hazardous waste, while lithium-ion batteries are universal waste that pose fire and safety hazards. To help the regulated community better understand the waste management requirements for vape waste, the Division has prepared a Retailer Requirements guide, a School Requirements guide, and tools to manage and measure E-cig waste such as printable container labels and spreadsheet calculators. All E-cig resources prepared by the Division are available at ecigwaste.utah.gov.

Additionally, the Division has assisted schools with a limited time program to collect and properly dispose of vapes from Utah schools free of charge. As part of this program, vapes are consolidated at a Local Health Department or School District in a region and then picked up by a permitted hazardous waste disposal facility. To date, 11 collection events have been held, which resulted in 242 lbs. of vape waste being properly disposed of, and over \$17,000 in cost savings for Utah schools. Check out this news clip of a successful event held at [Granite School District](#). There is still funding available for this program. Please reach out to Assistant Director, Stevie Norcross, at stevienorcross@utah.gov if you would like to host an E-cigarette collection event for schools in your region or if you have any other questions about the program.



Lithium-Ion Battery Safety

All spent lithium-ion batteries must be managed as a hazardous waste or universal waste and sent to a universal waste handler or destination facility. Universal waste batteries can only be accumulated for up to a year, so be sure to keep track of when the batteries began accumulating by marking the start date on the container. Store waste batteries in a container with a lid that can be securely closed. Label the container with the words “Universal waste batteries,” “Waste batteries,” or “Used batteries”. Place tape over ends of the batteries or place them in separate plastic bags to prevent short circuiting and combustion.

Exposed battery terminals may contact conductive material causing a short circuit and ignite combustible materials. Batteries may vent, rupture, or explode when subject to abuse including thermal, electrical, or physical abuse such as high temperatures, improper charging, or forced discharge. Lithium-ion batteries can vent flammable, toxic gases to create flammable and explosive atmospheres. Pressurized white “smoke” may vent moments prior to ignition of flammable/toxic gases. Battery cells can vent or ignite days after being damaged.

Water may suppress small lithium battery fires but will not extinguish the fire. Dry chemical extinguishers and suppression systems may extinguish active flaming, but do not stop flammable and toxic gas generation. The best action is prevention by handling batteries in a way that reduces the likelihood of battery fires.

In addition to fire hazards, pets and small children may ingest coin cell batteries, which can cause life threatening exposure. The battery can still discharge within the body and cause internal damage or eventual death. **The National Battery Ingestion Hotline number is 1-800-498-8666.**

Batteries are in so many of our everyday items like musical birthday cards, vape pens, scooters, phones, or electric vehicles. Ensuring batteries are safely managed and taken to a recycling center, rather than disposing of them in the trash, is one of the main goals of the universal waste program.

There's a little-known risk to small children

A COIN-SIZED LITHIUM BATTERY CAN GET STUCK IN A CHILD'S THROAT AND BURN THROUGH THE TISSUE IN JUST TWO HOURS, CAUSING SEVERE INJURY OR DEATH.

THESE TYPES OF DEVICES MAY CONTAIN COIN-SIZED LITHIUM BUTTON BATTERIES

KEEP OUT OF REACH. GET HELP FAST. TELL OTHERS.

The Battery Controlled

TheBatteryControlled.com.au

Supported by **Energizer** in partnership with **Kidsafe** and the Australian Competition & Consumer Commission to prevent injury.

ACCC_0912_304



Low-Level Radioactive Waste and EnergySolutions



EnergySolutions' waste disposal site at Clive Utah is located in an ideal transportation location. It is about 70 miles west of Salt Lake City with access to I-80 and a dedicated railroad line for large quantities of radioactive waste. EnergySolutions accepts approximately 200 radioactive and mixed waste shipments per month. Due to this high volume of waste and public concern, the State of Utah developed a program which enables regulation of these shipments and their respective generators.

The Division of Waste Management and Radiation Control, Low-Level Radioactive Waste Section, manages a Generator Site Access Program (GSAP) which allows a variety of industries involved in the generation of radioactive waste to obtain a permit to ship that waste to EnergySolutions, Clive Facility for disposal. The GSA Permit requires the shipper to ensure that all State and Federal regulations are followed that apply to the radioactive waste packaging, transportation, marking, labeling, and communication. The Low-Level Radioactive Waste Section currently has an inspector on site daily at EnergySolutions to verify that arriving shipments adhere to all State and Federal laws during transportation and that waste acceptance for disposal is verified properly.





TCLP vs Total Analysis and Dry Weight



Section 1.2 of Method 1311, Toxicity Characteristic Leaching Procedure (TCLP) **does** allow for a total constituent analysis in lieu of the TCLP extraction if performed properly. **If a waste is 100% solid**, as defined by the TCLP method, then the results of the total constituent analysis may be divided by twenty to convert the total results into the maximum leachable concentration. The total analysis must be calculated on a dry weight basis for the soils/solids. This factor is derived from the 20:1 liquid-to-solid ratio employed in the TCLP.

If a waste has filterable liquid, then the concentration of the analyte in each phase (liquid and solid) must be determined. The following equation may be used to calculate this value:

$$\frac{[A \times B] + [C \times D]}{B + [20 (L/kg) \times D]} = E$$

Where:

A = Concentration of the analyte in liquid portion of the sample (mg/L)

B = Volume of the liquid portion of the sample (L).

C = Concentration of the analyte in solid portion of the sample (mg/kg)

D = Weight of the solid portion of the sample (kg)

E = Maximum theoretical concentration in leachate (mg/L)

The value obtained (E) can be used to show that the maximum theoretical concentration in a leachate from the waste could not exceed the concentration specified in the toxicity characteristic (TC) (40 CFR 261.24).

In addition, if the total constituent analysis results themselves are below the TC limits without dividing by 20, then the same argument holds true, i.e., the maximum theoretical concentration in the leachate could not exceed the TC limits.





Potentially Hazardous Waste – Pending Analysis



The point of generation for hazardous waste is when it is first produced or first becomes subject to hazardous waste regulations, not when a generator first receives waste analysis results. The hazardous waste generator regulations in R315-262 UAC apply as soon as waste is generated, and the accumulation period applies either as soon as the waste is generated or when waste is removed from the satellite accumulation area (Memo, Lowrance to Axtell; April 21, 1989 ([RCRA Online #11424](#))). If a generator is unsure if the waste being tested is a hazardous waste, the generator must manage it as hazardous waste and label the containers with the potential hazard of the contents (e.g., ignitable, toxic, reactive, corrosive), the words “hazardous waste” (they could also use “hazardous waste pending analysis” to make it clear that testing is not yet complete), and the date upon which accumulation began. That way the generator will remain in compliance with the Part 262 labeling requirements if the waste is determined to be hazardous. If the waste is determined to be non-hazardous, the generator can remove the hazardous waste labels at that point.

Large quantity generators are allowed to accumulate hazardous waste onsite for 90 days or less (180 days or less for small quantity generators) without a RCRA permit or interim status if certain conditions are met. These conditions include:

- The date that the accumulation period begins must be clearly marked on each container, and
- Each container and tank must be labeled clearly with the words “Hazardous Waste” and an indication of the hazards of the contents.

To qualify for the 90- or 180-day accumulation exemption, all containers of unknown waste must be labeled as hazardous and dated when the waste is first generated, even if the contents are not yet known to be hazardous.



Mixtures of Hazardous Waste and Used Oil

In most cases, if you mix hazardous waste with used oil, the resulting mixture must be managed as hazardous waste rather than used oil. Mixing hazardous waste with used oil can also make it more costly to manage and dispose. It is very important to understand when mixtures can be managed as used oil or if they must be managed as hazardous waste.



Special Rules for VSQGs

A business that generates less than 220 pounds of hazardous waste in a calendar month is called a very small quantity generator (VSQG). VSQGs who mix used oil with either listed or characteristic hazardous waste can manage it as used oil if it will be recycled as a used oil. As a VSQG, if you plan to dispose of your used oil/hazardous waste mixture rather than recycle it as a used oil, you must evaluate the mixture to determine if it is hazardous and manage it accordingly.

Exceptions for SQGs and LQGs

If you generate 220 pounds or more of hazardous waste in a calendar month [small quantity generator (SQG) or large quantity generator (LQG)] and you mix your hazardous waste with your used oil, the resulting mixture will likely be considered a hazardous waste rather than a

used oil. There are a few exceptions in the used oil mixture rule, however, that allow mixtures of certain listed and/or characteristic hazardous wastes and used oil to be managed as used oil.

- Mixtures of used oil and a waste that is hazardous waste only for ignitability may be managed as used oil if the resulting mixture is not ignitable.

- Mixtures of waste that exhibit one or more characteristics of hazardous waste and used oil can be managed as used oil if the resulting mixture does not exhibit ANY characteristic of hazardous waste. Otherwise, the mixture must be managed as hazardous waste here are two examples:

- Mixtures of listed hazardous waste with used oil must be managed as a listed hazardous waste rather than a used oil UNLESS the listed hazardous waste was listed solely because it exhibits one or more characteristics (ignitable, corrosive, or reactive, NOT toxic), and the resulting mixture does not exhibit ANY characteristics of hazardous waste - in this instance, it may be managed as used oil. For example, F003 is a listed hazardous waste that was listed solely for its ignitability characteristic. If you mix an F003 listed hazardous waste with used oil, and the resulting mixture does not exhibit the ignitability (or any other) characteristic, it can be managed as used oil. Otherwise, it must be managed as an F003 listed hazardous waste.

Used Oil Containing Halogens

If used oil contains more than 1,000 ppm total halogens, it is presumed to have been mixed with a hazardous waste. Used oil containing more than 1,000 ppm total halogens cannot be managed as a used oil unless you can demonstrate that the halogens are not from a listed hazardous waste or that you are a VSQG. This applies to all used oil regardless of whether it is being used as a fuel or is re-refined to make a lubricant.



Hazardous Waste TSDF Update

Hill Air Force Base (HAFB) and The Utah Test and Training Range (UTTR) continued hazardous waste storage and treatment operations throughout 2022. Both sites are preparing for the Air Force's new Ground-Based Strategic Deterrent, the Sentinel. Minuteman III missiles from surrounding silos will be transported to UTTR for storage and disposal over a planned eight-year decommissioning process. HAFB will perform assembly, disassembly, and maintenance on the new Sentinel boosters.

UTTR is preparing to renew their RCRA Part B permit in 2023. They completed surface confirmation sampling at Landfill 5 and intend to begin final grading and site restoration of the area once the cumulative risk assessment is approved.





Point of Generation



In general, the point of generation is that point where a material first meets the definition of a “solid waste.” A “solid waste” includes any solid, semi-solid, liquid, or contained gaseous material that is intended to be discarded. The moment you decide a material is destined to be discarded, it is a solid waste. That moment is the “point of generation,” at which point you must determine if it is a hazardous waste.

Also keep in mind that a discarded material is a solid waste. Let us review the four categories of “discarded materials” identified by the EPA.

1. Garbage, refuse, and sludge.
2. Materials that are thrown away, abandoned, or destroyed.
3. A spent material is any material that has been used and, as a result of contamination, can no longer serve the purpose for which it was produced without undergoing regeneration, reclamation, or reprocessing (R315-261-1(c)(1) UAC).
4. Tars, residues, slags, and other materials that are incidentally generated as part of the manufacturing or mining process.

Identifying the point of generation is sometimes difficult, due to the many site-specific factors that affect how and when the waste is generated. For this reason, when a generator is having difficulty identifying the point of generation, it can be a good idea to obtain a site-specific determination from the State or implementing agency.



Generator Knowledge Based Determinations



To determine if a solid waste is a listed hazardous waste, you must know the source of the waste. Making a listed waste determination is primarily achieved using knowledge. Assessing whether a waste exhibits a characteristic, however, can be accomplished using testing or knowledge.

If you want to, as the generator, make a knowledge-based determination that a waste is not hazardous, it is important to be correct.

The regulations were revised to be clearer about what is acceptable knowledge. EPA’s guidance groups acceptable knowledge into the following categories:

- Process knowledge,
- Incidents of human injury or environmental damage, and
- Waste composition or properties from analysis or relevant testing performed by the generator.

Process Knowledge:

“Process knowledge refers to detailed information on processes that generate wastes subject to characterization, or to detailed information on wastes generated from processes similar to that which generated the original waste.” This can include Safety Data Sheets, engineering production data, material balances that include an analysis of constituents of concern in materials, process kinetic information and process rates, and other engineering calculations.

Incidents of Human Injury or Environmental Damage:

Any information generated in response to such human injury/environmental damage situations attributed to the waste could be used as acceptable knowledge.

Waste Composition or Properties from Analysis:

This type of “acceptable knowledge” could include waste analysis data obtained from other locations that use substantially similar processes and/or managing substantially similar waste streams, and previous analytical data.

“Compliance is best ensured through sampling and analysis.”

Keep all records where generator knowledge was used for a waste determination, both for non-hazardous and hazardous waste.



Correction Action 2022 Accomplishments

RCRA Permitted Treatment and Storage Facilities

The *ATK Launch Systems/Northrop Grumman Corporation – Bacchus and NIROP (ATK-Bacchus)* located in Magna, Utah provides highly specialized technical services for commercial and governmental agencies like the U.S. Dept. of Defense and NASA. Some of ATK’s work involves designing and building propulsion systems for guided missiles and space rocket motors.

ATK-Bacchus is required to perform site wide RCRA Facility Investigations (RFIs) and Corrective Measures Implementations (CMIs) or remediations if needed as part of obtaining a RCRA Hazardous Waste Storage and Treatment Permit. Over the last federal fiscal year stretching back to October 1, 2021, ATK-Bacchus was able to complete RFI Investigations and submit reports for review that justified approving No Further Action designations for Solid Waste Management Units (SWMUs) S-30, S-31, and S-35 at the facility.

The *ATK Launch Systems/Northrop Grumman Corporation – Promontory (ATK-Promontory)* facility is located in Northern Utah, approximately 30 miles northwest of Brigham City. Since 1956, ATK Promontory and its predecessors have been primarily involved in the research, testing and production of propellants for rocket motors. The manufacturing processes include the preparation and mixing of high-energy ingredients, casting, and curing of the propellant formulations, assembly of rocket motor segments and military flares, and quality control testing of finished products.

ATK-Promontory is also required to perform site wide RCRA Facility Investigations (RFIs) and Corrective Measures Implementations (CMIs) or remediations if needed as part of obtaining a RCRA Hazardous Waste Storage and Treatment Permit. Over the last federal fiscal year, stretching back to October 1, 2021, ATK-Promontory was able to complete RFI Investigations and submit reports for review that justified approving No Further Action designations for three different wastewater discharge SWMUs (606, 610, and 619) at the facility.

Voluntary Cleanup Sites

During 2022, the Correction Action Section (Section) was able to work with one property owner to obtain a no further action designation and a no further investigation designation on another property. In addition, the Section worked with 12 property owners to complete investigations, and in some cases remedial work, to put approved Site Management Plans and Environmental Covenants in place to address residual contamination on the properties.

The Section continues to oversight investigative and remedial work on 39 properties in the state.



Statewide Recycling Data Initiative

DWMRC is leading the way in a statewide recycling data initiative by creating a centralized, web-based platform to collect and share recycling data. By collecting voluntary data along with data required from permitted solid waste facilities, we can better understand the effectiveness of recycling efforts in Utah. Permitted solid waste facility annual reports were revised in 2022, and new reports were designed to collect information from non-permitted facilities to include county and statewide recycling data and contact information. Additionally, an interactive map is currently being developed to assist the public in locating solid waste and recycling facilities. This map will also display statewide recycling performance data.

To make this initiative successful, we are asking all facilities in Utah that recycle to participate by providing data to us on an annual basis through a simple online portal. For more information or to submit a request to participate, go to Recycle.utah.gov.

Don't forget to sign up for our new "Recycling" email list to stay in touch!



WMRC Mailing List

Stay informed on the latest Solid Waste, Hazardous Waste, or Used Oil activities by signing up for our email list!

After selecting your area of interest, you will receive notices on topics such as permit actions, closure and clean-up decisions site management plans, rule changes, Waste Management and Radiation Control Board agendas, and public comment periods/public hearings.

On this site you may also sign up for email notices regarding Air Quality, Water Quality, or other public participation activities.

To sign up, click on the icon to the right.



Newsletter Contributors

Doug Hansen, WMRC
Stevie Norcross, WMRC
Gage Fausto, WMRC
Deborah Ng, WMRC
Brian Speer, WMRC
Phil Goble, WMRC
Editor: Craig Jorgensen, WMRC

Jalynn Knudsen, WMRC
Gabrielle Marinick, WMRC
Eleanor Divver, OPPA
Brad Maulding, WMRC
Carlee Christoffersen, WMRC
Sarah Dehnert, WMRC



**WASTE MANAGEMENT
& RADIATION CONTROL**

P.O. Box 144880

Salt Lake City, UT 84114-4880

801.536.0200

<https://deq.utah.gov/division-waste-management-radiation-control>