

RNCM 90

file
Kueber
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MEMO OF PHONE CONVERSATION

Originator: David Morgan

To: RCRA Hotline

Date & time: 8/22/90; 4:50

Subject: Rinchem's request to bulk waste into tank trucks

I explained the Rinchem situation (that they are both a transporter and a permitted storage facility; and that they would like to be able to combine drummed waste into tank trucks for shipment off-site) and asked if there was anything that would be different about a permitted facility doing this instead of a transporter.

The hotline person said that the central issue was keeping the manifests straight. The bulking is basically done under the aegis of the transporter regulations (so, among other things, the ten-day storage limit would apply after bulking) and Rinchem would be obligated to:

- Ensure that waste manifested to a particular facility (other than Rinchem) was in fact shipped to that facility. Waste manifested to different facilities **may not be mixed**. If enough drums were manifested to a particular destination, they could be combined in a tank truck, and sent on with their original manifests - unless they were of different DOT classifications, in which case a new manifest would have to be prepared.

- Prepare a new manifest for any waste manifested to Rinchem as the designated facility, and then bulked and sent on. The hotline person said that he thought they would not be able to combine waste manifested to them with waste manifested to another destination - in other words, keep their "transporter" waste separate from their "storage" waste.