

<u>SUBJECT</u>		<u>DATE</u>
1056. PCB Reporting and Recordkeeping Relief	ENCORE	JAN 12, 2014
1057. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 16, 2014
1058. PCB Annual Records Retention Timeframes		JAN 31, 2014
1059. Satellite Accumulation within a ≤90-day Accumulation Area		FEB 7, 2014
1060. PCB Certificate of Disposal Relief	ENCORE	FEB 13, 2014
1061. Used Oil and Weekly Inspections		FEB 20, 2014
1062. Bags and RCRA Container Definition		FEB 27, 2014
1063. Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	MAR 6, 2014
1064. Spent Lead-Acid Batteries and Accumulation Time Limits		MAR 13, 2014
1065. Land Disposal Restrictions and Dates of Accumulation		MAR 23, 2014
1066. Universal Waste Accumulation Time Limits and the One Year Rule		MAR 29, 2014
1067. PCB Manifest Discrepancy Reports and Estimated Waste Weights		APR 6, 2014
1068. PCB Wastes, Independent Transporters and Confirmation of Receipt		APR 10, 2014
1069. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	APR 20, 2014
1070. Other Paint Wastes and the Applicability of the F001-F005 Listings	ENCORE	APR 24, 2014
1071. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents		MAY 1, 2014
1072. TSCA "No PCBs" versus "Non-PCBs" versus "Nondetectable PCBs"	ENCORE	MAY 8, 2014
1073. Purpose of Keeping a Hazardous Waste Container Closed	ENCORE	MAY 15, 2014
1074. PCB Containers and Multiple Removed From Service Dates		MAY 22, 2014
1075. Satellite Accumulation and RCRA Personnel Training		MAY 29, 2014
1076. Transporter Signatures on Hazardous Waste Manifest and Multiple Drivers		JUN 5, 2014
1077. Universal Waste and Nonhazardous Batteries		JUN 12, 2014
1078. Universal Waste and Incandescent Bulbs		JUN 19, 2014
1079. The PCB Mark and the Fields "Also Contact" and "Tel No"	ENCORE	JUN 29, 2014
1080. Halon Fire Extinguishers - Banned or Not Banned?	ENCORE	JUL 5, 2014
1081. Cabinets as RCRA Containers	ENCORE	JUL 13, 2014
1082. LDR Storage Prohibitions and Treated Wastes	ENCORE	JUL 17, 2014
1083. LDR Treatment Standards and F001 "Chlorinated Fluorocarbons"	ENCORE	JUL 24, 2014
1084. RCRA Regulatory Status of Chlorinated Fluorocarbons Used as Refrigerants	ENCORE	JUL 31, 2014
1085. Universal Wastes, Manifesting and DOT Shipping Names		AUG 7, 2014
1086. CERCLA Hazardous Substances – A Brief Definition		AUG 14, 2014
1087. CERCLA Hazardous Substances – The Petroleum Exclusion		AUG 21, 2014
1088. PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE	AUG 28, 2014
1089. Universal Waste and Basis for the One Year Accumulation Time Limit		SEP 4, 2014
1090. Product Spills and Waste Determinations	ENCORE	SEP 11, 2014
1091. PCB Concentrations and 10,000 PPM		SEP 18, 2014
1092. PCB Concentrations and 1,000 PPM		SEP 25, 2014
1093. Universal Waste Alkaline Batteries and Self-Transportation		OCT 2, 2014
1094. Universal Waste Lithium Batteries and Self-Transportation		OCT 9, 2014
1095. Universal Waste Batteries and Closed Containers	ENCORE	OCT 16, 2014
1096. PCB Containers and Concentration of PCBs		OCT 23, 2014
1097. Recyclable Chemicals and Zombie Destruction		OCT 31, 2014
1098. Satellite Accumulation Requirements in Washington State	ENCORE	NOV 6, 2014
1099. Satellite Accumulation and "At or Near"		NOV 13, 2014
1100. Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE	NOV 20, 2014
1101. Defining Criteria for Household Waste Exclusion	ENCORE	NOV 26, 2014
1102. The Household Waste Exclusion and Renovation Debris		DEC 4, 2014
1103. The Household Waste Exclusion and Renovation Debris – Part II		DEC 11, 2014
1104. PCB Ballasts and Disposal Options	ENCORE	DEC 18, 2014
1105. 'Twas the Night Before Christmas – The Twenty-Second Edition		DEC 24, 2014
1106. Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE	JAN 1, 2015
1107. Satellite Accumulation and Product Vessel Cleanouts		JAN 8, 2015
1108. Date of Accumulation for Hazardous Waste and Receipt of Analytical Information	ENCORE	JAN 15, 2015
1109. Conservative Declarations that Material is a Hazardous Waste		JAN 22, 2015
1110. Hazardous Waste Generator Tanks and the Date of Accumulation Marking	ENCORE	JAN 29, 2015
1111. Universal Waste, Satellite Accumulation and Centralized Collection Areas		FEB 4, 2015
1112. The PCB Mark and PCB Storage for Disposal Areas	ENCORE	FEB 12, 2015

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## TWO MINUTE TRAINING

**TO:** CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, Senior Environmental Compliance Officer  
CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** THE PCB MARK AND PCB STORAGE FOR DISPOSAL AREAS

**DATE:** FEBRUARY 12, 2015

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Ty Blackford Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Roni Swan Michael Waters Jeff Westcott Jeff Widney	Brett Barnes Ron Brunke Bill Cox Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Don Rokkan Lana Strickling Lou Upton Christina Zerby	Alan Campbell Grant McCalmant  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Judith Nielsen Mandy Pascual Kirk Peterson Jean Quigley	Mark Rollison Dan Saueressig Merrie Schilperoort Joelle Stamm Glen Triner Greg Varljen Julie Waddoups Kyle Webster Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** The PCB Mark and PCB Storage for Disposal Areas

**Q:** During an internal audit, a customer notes a sign at their PCB Storage for Disposal area that states, “Storage Area for PCBs”. The customer is concerned that this wording might not meet the requirements of 40 CFR 761.40, “Marking of PCBs and PCB Items”. Should the customer be concerned?

**A:** Yes.

Per 40 CFR 761.40(a)(10) it basically states that each storage area used to store PCBs and PCB Items for disposal shall be marked with the mark as illustrated in Figure 1 in §761.45(a). This is the same PCB mark that is applied to PCB containers, PCB transformers, PCB large high voltage capacitors, PCB equipment, etc. as illustrated below.



**Figure 1**

Therefore, if a PCB storage for disposal facility is marked in a manner that does not match the illustration at 40 CFR 761.45(a), Figure 1, a PCB marking violation could occur.

### SUMMARY:

- A PCB storage for disposal facility must be marked with the PCB Mark.
- The PCB Mark format is illustrated at 40 CFR 761.45(a), Figure 1.
- Any variation of the PCB mark could result in a PCB marking violation.

Excerpts from 40 CFR 761.40 and 761.45 are attached to the e-mail. If you have any questions, please contact me at “Paul\_W\_Martin@rl.gov” or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 2/12/15

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**PG:** 1

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** The PCB Mark and PCB Storage for Disposal Areas

### Subpart C—Marking of PCBs and PCB Items

#### § 761.40 Marking requirements.

(a) Each of the following items in existence on or after July 1, 1978 shall be marked as illustrated in Figure 1 in §761.45(a): The mark illustrated in Figure 1 is referred to as ML throughout this subpart.

- (1) PCB Containers;
- (2) PCB Transformers at the time of manufacture, at the time of distribution in commerce if not already marked, and at the time of removal from use if not already marked. [Marking of PCB-Contaminated Electrical Equipment is not required];
- (3) PCB Large High Voltage Capacitors at the time of manufacture, at the time of distribution in commerce if not already marked, and at the time of removal from use if not already marked;
- (4) Equipment containing a PCB Transformer or a PCB Large High Voltage Capacitor at the time of manufacture, at the time of distribution in commerce if not already marked, and at the time of removal of the equipment from use if not already marked;
- (5) PCB Large Low Voltage Capacitors at the time of removal from use (see also paragraph (k) of this section).
- (6) Electric motors using PCB coolants (See also paragraph (e) of this section).
- (7) Hydraulic systems using PCB hydraulic fluid (See also paragraph (e) of this section);
- (8) Heat transfer systems (other than PCB Transformers) using PCBs (See also paragraph (e) of this section);
- (9) PCB Article Containers containing articles or equipment that must be marked under paragraphs (a)(1) through (8) of this section;
- (10) Each storage area used to store PCBs and PCB Items for disposal.

#### §761.45 Marking formats.

The following formats shall be used for marking:

(a) *Large PCB Mark—ML.* Mark ML shall be as shown in Figure 1, letters and striping on a white or yellow background and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The size of the mark shall be at least 15.25 cm (6 inches) on each side. If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 5 cm (2 inches) on each side.

**FROM:** Paul W. Martin

**DATE:** 2/12/15

**FILE:** c:\...\2MT\2015\021215.rtf

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