

<u>SUBJECT</u>		<u>DATE</u>
1056. Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	APR 23, 2015
1057. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	APR 30, 2015
1058. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAY 7, 2015
1059. Decharacterized Wastes, <90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAY 14, 2015
1060. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAY 21, 2015
1061. Hazardous Debris Macroencapsulation and Size Reduction	ENCORE	MAY 28, 2015
1062. Universal Waste Lamps and Prohibition on Crushing		JUN 4, 2015
1063. F003 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 11, 2015
1064. F001 - F005 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 18, 2015
1065. Macroencapsulation of Hazardous Debris and Presence of Free Liquids	ENCORE	JUN 25, 2015
1066. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries		JUL 1, 2015
1067. Used Oil Eligibility for Animal and Vegetable Oils	ENCORE	JUL 9, 2015
1068. Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils		JUL 16, 2015
1069. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 23, 2015
1070. Conditioned Exclusion for Characteristic Debris Treated via Immobilization		JUL 30, 2015
1071. RCRA Personnel Training and Classroom Training vs. Online Training		AUG 6, 2015
1072. PCB Decontamination Standards with No Decontamination Performed		AUG 13, 2015
1073. PCB Manifest Exceptions a.k.a. When is a PCB Manifest Not Required?	ENCORE	AUG 19, 2015
1074. PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel		AUG 27, 2015

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## TWO MINUTE TRAINING

**TO:** CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** PCB MANIFEST RELIEF A.K.A., WHEN IS A PCB MANIFEST NOT REQUIRED? – THE SEQUEL

**DATE:** AUGUST 27, 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 Widney	Brett Barnes Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Ray Swenson 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 Christina Robison Don Rokkan Lana Strickling Lou Upton	(TBD)  <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 Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson Jean Quigley	Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Kyle Webster Jeff Westcott Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel

**Q:** Subpart K of 40 CFR 761 contains waste disposal records and reports that apply to PCBs, PCB Items, and to PCB storage and PCB disposal facilities, subject to the TSCA requirements. One of the disposal records under Subpart K concerns the manifest so basically this means that if something is regulated by TSCA for PCBs, then a manifest is required. With that said, do the TSCA regulations provide any relief from the PCB manifesting requirements of Subpart K?

**A:** Yes, there is relief! Specifically there are six references to regulatory relief from the PCB manifesting requirements of Subpart K. These include:

- ❑ PCB-Contaminated Articles ( $\geq 50$  ppm to  $< 500$  ppm) from which all free-flowing liquids have been removed;
- ❑ Non-liquid PCB remediation waste destined for disposal and consisting of cleanup wastes;
- ❑ PCB Bulk Product waste eligible for disposal in a solid waste landfill;
- ❑ Non-liquid PCB analytical wastes;
- ❑ Non-liquid cleaning materials and personal protective equipment (PPE) resulting from decontamination, and;
- ❑ Cleanup equipment used in the double wash/rinse method for decontaminating non-porous surfaces.

Note that all PCB wastes associated with the relief from Subpart K manifesting are non-liquids and generally eligible for disposal in a municipal solid waste landfill. Also note that unless the TSCA regulations specifically provide relief from manifesting, no relief from manifesting is provided. One final note is that these PCB wastes with relief from Subpart K manifesting, also have relief from Subpart J concerning the PCB annual report and annual document log.

### SUMMARY:

- Most PCB regulated materials are subject to the manifesting requirements outlined in Subpart K of 40 CFR 761.
- However, some manifest relief is provided via specific wording in the TSCA regulations.
- Manifest relief is applicable to drained PCB Contaminated Articles; non-liquid cleanup wastes from PCB Remediation Wastes; PCB Bulk Product waste eligible for solid waste landfill disposal; non-liquid PCB Analytical Wastes; non-liquid cleaning materials and PPE from decontamination; and cleanup equipment from the double washing/rinsing of non-porous surfaces.

Excerpts from 40 CFR 761 concerning relief from Subpart K manifesting 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:** 8/27/15

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel

### 40 CFR 761 Subpart K—PCB Waste Disposal Records and Reports

#### §761.207 The manifest-general requirements

(a) A generator who transports, or offers for transport PCB waste for commercial off-site storage or off-site disposal, and commercial storage or disposal facility who offers for transport a rejected load of PCB waste, must prepare a manifest on EPA Form 8700-22, and, if necessary, a continuation sheet, according to the instructions included in the appendix of 40 CFR Part 262. The generator shall specify...

#### 40 CFR 761.60(b)(6) Other PCB Articles.

(ii)(C) Requirements in subparts J and K of this part do not apply to PCB-Contaminated Articles from which all free-flowing liquids have been removed.

#### 40 CFR 761.61(a)(5) PCB Remediation Waste

(v) Cleanup wastes. Any person generating the following wastes during and from the cleanup of PCB remediation waste shall dispose of or reuse them using one of the following methods:

(A) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from cleanup activities shall be either decontaminated in accordance with §761.79(b) or (c), or disposed of in one of the following facilities, without regard to the requirements of subparts J and K of this part:

#### 40 CFR 761.62 Disposal of PCB bulk product waste.

(b) Disposal in solid waste landfills.

(6) Requirements in subparts C, J, and K of this part do not apply to waste disposed of under paragraph (b) of this section.

#### 40 CFR 761.64 Disposal of wastes generated as a result of research and development activities authorized under §761.30(j) and chemical analysis of PCBs.

(b)(2) Non-liquid wastes must be disposed of in the same manner as non-liquid cleaning materials and personal protective equipment waste according to §761.61(a)(5)(v)(A). (See above)

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel

### 40 CFR 761.79 Decontamination standards and procedures.

- (g)(6) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from decontamination shall be disposed of in accordance with §761.61(a)(5)(v). (See above)

### 40 CFR 761.378 Decontamination, reuse, and disposal of solvents, cleaners, and equipment.

- (c) Disposal. Dispose of all solvents, cleaners, and absorbent materials in accordance with §761.79(g). Dispose of equipment in accordance with §761.61(a)(5)(v)(A), (See above) or decontaminate in accordance with §761.79(b) or (c). Store for disposal equipment, solvents, cleaners, and absorbent materials in accordance with §761.65.