

<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

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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: PCB CONCENTRATIONS AND 10,000 PPM

DATE: SEPTEMBER 18, 2014

<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 Tom Gilmore Stuart Hildreth Mike Jennings Stephanie Johansen Dan Kimball Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen 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 Jim Leary Dale McKenney 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. Darlene Hagel Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Matt Mills Anthony Nagel Jennifer Ollero Jon Perry Thomas Pysto Phillip Rogers 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 Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Steve Metzger Tony Miskho 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: PCB Concentrations and 10,000 PPM

Q: Most customers know the significance of the concentration ≥ 50 ppm PCB waste, i.e., it is regulated. Are there any instances where regulated PCB waste with concentrations at or near 10,000 ppm can be subject to other specific requirements in 40 CFR 761?

A: Yes there are!

40 CFR 761.60(j)(1)(iii) concerns self-implementing requirements for research and development and limits the amount of material containing PCBs treated annually during R&D disposal activities to 500 gallons or 70 cubic feet and a maximum concentration of 10,000 ppm PCBs.

40 CFR 761.79(c)(3) concerns self-implementing decontamination procedures for non-porous surfaces in contact with free-flowing mineral oil dielectric fluid (MODEF) at levels $\leq 10,000$ ppm PCBs.

40 CFR 761.79(c)(4) also concerns self-implementing decontamination procedures for non-porous surfaces in contact with free-flowing MODEF but at levels $> 10,000$ ppm PCBs.

These were the only three instances referencing “10,000 ppm” PCBs in 40 CFR 761.

SUMMARY:

- PCB wastes are generally regulated if concentration is ≥ 50 ppm.
- PCB wastes can have specific requirements if concentrations are in the 10,000 ppm range.
- There are three instances of PCB concentrations referencing 10,000 ppm and all concern self-implementing requirements for R&D or decontamination.

Excerpts from 40 CFR 761.60(j) and 40 CFR 761.79(c) 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: 9/18/14

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Concentrations and 10,000 PPM

40 CFR §761.60 Disposal requirements

(j) *Self-implementing requirements for research and development (R&D) for PCB disposal.*

(1) Any person may conduct R&D for PCB disposal without prior written approval from EPA if they meet the following conditions:

- (i) File a notification and obtain an EPA identification number pursuant to subpart K of this part.
- (ii) Notify in writing the EPA Regional Administrator, the State environmental protection agency, and local environmental protection agency, having jurisdiction where the R&D for PCB disposal activity will occur at least 30 days prior to the commencement of any R&D for PCB disposal activity conducted under this section. Each written notification shall include the EPA identification number of the site where the R&D for PCB disposal activities will be conducted, the quantity of PCBs to be treated, the type of R&D technology to be used, the general physical and chemical properties of material being treated, and an estimate of the duration of the PCB activity. The EPA Regional Administrator, the State environmental protection agency, and the local environmental protection agency may waive notification in writing prior to commencement of the research.
- (iii) The amount of material containing PCBs treated annually by the facility during R&D for PCB disposal activities does not exceed 500 gallons or 70 cubic feet of liquid or non-liquid PCBs and does not exceed a maximum concentration of **10,000 ppm** PCBs.
- (iv) No more than 1 kilogram total of pure PCBs per year is disposed of in all R&D for PCB disposal activities at a facility.
- (v) Each R&D for PCB disposal activity under this section lasts no more than 1 calendar year.
- (vi) Store all PCB wastes (treated and untreated PCB materials, testing samples, spent laboratory samples, residuals, untreated samples, contaminated media or instrumentation, clothing, etc.) in compliance with §761.65(b) and dispose of them according to the undiluted PCB concentration prior to treatment. However, PCB materials not treated in the R&D for PCB disposal activity may be returned either to the physical location where the samples were collected or a location where other regulated PCBs from the physical location where the samples were collected are being stored for disposal.
- (vii) Use manifests pursuant to subpart K of this part for all R&D PCB wastes being transported from the R&D facility to an approved PCB storage or disposal facility. However, §§761.207 through 761.219 do not apply if the residuals or treated samples are returned either to the physical location where the samples were collected or a location where other regulated PCBs from the physical location where the samples were collected are being stored for disposal.
- (viii) Package and ship all PCB wastes pursuant to DOT requirements under 49 CFR parts 171 through 180.
- (ix) Comply with the recordkeeping requirements of §761.180.

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Concentrations and 10,000 PPM

40 CFR §761.79 Decontamination standards and procedures

(c) *Self-implementing decontamination procedures.* The following self-implementing decontamination procedures are available as an alternative to the measurement-based decontamination methods specified in paragraph (b) of this section. Any person performing self-implementing decontamination must comply with one of the following procedures.

(3) Any person decontaminating a non-porous surface in contact with free-flowing mineral oil dielectric fluid (MODEF) at levels **≤10,000 ppm** PCBs must do so as follows:

- (i) Drain the free-flowing MODEF and allow the residual surfaces to drain for an additional 15 hours.
- (ii) Dispose of drained MODEF according to paragraph (g) of this section.
- (iii) Soak the surfaces to be decontaminated in a sufficient amount of clean (containing <2 ppm PCBs) performance-based organic decontamination fluid (PODF) such that there is a minimum of 800 ml of PODF for each 100 cm² of contaminated or potentially contaminated surface for at least 15 hours at ≥20 °C.
- (iv) Approved PODFs include:
 - (A) Kerosene.
 - (B) Diesel fuel.
 - (C) Terpene hydrocarbons.
 - (D) Mixtures of terpene hydrocarbons and terpene alcohols.
- (v) Drain the PODF from the surfaces.
- (vi) Dispose of the drained PODF in accordance with paragraph (g) of this section.

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Concentrations and 10,000 PPM

40 CFR §761.79 Decontamination standards and procedures

(c) *Self-implementing decontamination procedures.* The following self-implementing decontamination procedures are available as an alternative to the measurement-based decontamination methods specified in paragraph (b) of this section. Any person performing self-implementing decontamination must comply with one of the following procedures.

(4) Any person decontaminating a non-porous surface in contact with free-flowing MODEF containing **>10,000 ppm** PCB in MODEF or askarel PCB (up to 70 percent PCB in a mixture of trichlorobenzenes and tetrachlorobenzenes) must do so as follows:

- (i) Drain the free-flowing MODEF or askarel and allow the residual surfaces to drain for an additional 15 hours.
- (ii) Dispose of drained MODEF or askarel according to paragraph (g) of this section.
- (iii) Soak the surfaces to be decontaminated in a sufficient amount of clean PODF (containing <2 ppm PCBs) such that there is a minimum of 800 ml of PODF for each 100 cm² of contaminated or potentially contaminated surface for at least 15 hours at ≥ 20 °C.
- (iv) Approved PODFs include:
 - (A) Kerosene.
 - (B) Diesel fuel.
 - (C) Terpene hydrocarbons.
 - (D) Mixtures of terpene hydrocarbons and terpene alcohols.
- (v) Drain the PODF from the surfaces.
- (vi) Dispose of the drained PODF in accordance with paragraph (g) of this section.
- (vii) Resoak the surfaces to be decontaminated, pursuant to paragraph (c)(3)(iii) of this section, in a sufficient amount of clean PODF (containing <2 ppm PCBs) such that there is a minimum of 800 ml of PODF for each 100 cm² of surface for at least 15 hours at ≥ 20 °C.
- (viii) Drain the PODF from the surfaces.
- (ix) Dispose of the drained PODF in accordance with paragraph (g) of this section.

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DATE: 9/18/14

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