

<u>SUBJECT</u>		<u>DATE</u>
1188. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190. Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191. Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192. Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193. Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194. Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195. Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196. Hazardous Waste Determinations and Phase Separation		OCT 6, 2016
1197. Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198. PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016

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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 CONTAINERS AND CONCENTRATION OF PCBS

DATE: OCTOBER 20, 2016

<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 Roni Ashley Tania Bates Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Marty Martin Jim McGrogan Stuart Mortensen Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters Jeff Westcott Jeff Widney	Brett Barnes Mitch Boyd Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Sasa Kosjerina Jim Leary Dale McKenney Jon McKibben Rick Oldham Anthony Nagel Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Lori Fritz 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 Jay Warwick Kyle Webster Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: PCB Containers and Concentration of PCBs

Q: A customer has two containers of non-remediation waste contaminated with polychlorinated biphenyls (PCBs). One container contains waste with a PCB concentration of 100 ppm PCBs and the other container contains waste with a PCB concentration of 25 ppm PCBs and not the result of prohibited dilution. The customer is inventorying PCB waste containers but is not sure if there are two PCB Containers since both are contaminated with PCBs, or just one PCB container since only one is contaminated with PCBs ≥ 50 ppm. What exactly is a “PCB Container” in terms of Toxic Substances Control Act (TSCA) PCBs, and what is the correct PCB classification for these two waste containers?

A: Per [40 CFR 761.3](#), the definition of a “PCB Container” is:

“any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs”.

Note the lack of a reference to PCB concentration in the definition of PCB Container while on the other hand the definitions of a PCB Transformer (≥ 500 ppm) or a PCB Contaminated Electrical Equipment (≥ 50 ppm and < 500 ppm) do include PCB concentration ranges. Based on the PCB container definition the customer might think that both containers are PCB Containers since both contain some concentration of PCBs.

However, an EPA guidance document entitled, [EPA's Final PCB Ban Rule: Over 100 Questions and Answers to Help Meet These Requirements, June 1980](#) on page 4, Question 10, states:

“Does this rule apply to all PCBs or is there a cut-off point based on the concentration of PCBs?”

EPA’s response was:

“In order to practically implement this rule (i.e., exceptions, disposal and marking requirements), EPA had to adopt a PCB concentration cut-off point for regulation. Therefore, the final rule applies to any substance, mixture, or item with 50 ppm or greater PCB; wherever the term ‘PCB’ or ‘PCBs’ is used in the rule, it means PCBs at a concentration of 50 ppm or greater, unless otherwise specified” [emphasis added].

Therefore, the customer’s waste container with PCBs at 25 ppm would not be a PCB Container since the PCB concentration is < 50 ppm and in this case not regulated as TSCA PCB waste. The customer’s waste container with PCBs at 100 ppm would be a PCB Container since the PCB concentration is ≥ 50 ppm and regulated as TSCA PCB waste. Therefore, for the purposes of the customer’s inventory, there is one “PCB Container”.

SUMMARY:

- A PCB Container means any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.
- The term “PCB” or “PCBs” means PCBs at a concentration of ≥ 50 ppm, unless otherwise specified.
- A “PCB Container” means the waste contains ≥ 50 ppm, assuming no prohibited dilution has occurred.

Excerpts from 40 CFR 761.3 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: 10/20/16

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Containers and Concentration of PCBs

40 CFR 761.3 Definitions

PCB and **PCBs** means any chemical substance that is limited to the biphenyl molecule that has been chlorinated to varying degrees or any combination of substances which contains such substance. Refer to §761.1(b) for applicable concentrations of PCBs. PCB and PCBs as contained in PCB items are defined in §761.3. For any purposes under this part, inadvertently generated non-Aroclor PCBs are defined as the total PCBs calculated following division of the quantity of monochlorinated biphenyls by 50 and dichlorinated biphenyls by 5.

PCB Container means any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.

PCB-Contaminated means a non-liquid material containing PCBs at concentrations ≥ 50 ppm but < 500 ppm; a liquid material containing PCBs at concentrations ≥ 50 ppm but < 500 ppm or where insufficient liquid material is available for analysis, a non-porous surface having a surface concentration $> 10 \mu\text{g}/100 \text{cm}^2$ but $< 100 \mu\text{g}/100 \text{cm}^2$, measured by a standard wipe test as defined in §761.123.

PCB-Contaminated Electrical Equipment means any electrical equipment including, but not limited to, transformers (including those used in railway locomotives and self-propelled cars), capacitors, circuit breakers, reclosers, voltage regulators, switches (including sectionalizers and motor starters), electromagnets, and cable, that contains PCBs at concentrations of ≥ 50 ppm and < 500 ppm in the contaminating fluid. In the absence of liquids, electrical equipment is PCB-Contaminated if it has PCBs at $> 10 \mu\text{g}/100 \text{cm}^2$ and $< 100 \mu\text{g}/100 \text{cm}^2$ as measured by a standard wipe test (as defined in §761.123) of a non-porous surface.

PCB Equipment means any manufactured item, other than a PCB Container or a PCB Article Container, which contains a PCB Article or other PCB Equipment, and includes microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.

PCB Item means any PCB Article, PCB Article Container, PCB Container, PCB Equipment, or anything that deliberately or unintentionally contains or has as a part of it any PCB or PCBs.

PCB Transformer means any transformer that contains ≥ 500 ppm PCBs. For PCB concentration assumptions applicable to transformers containing 1.36 kilograms (3 lbs.) or more of fluid other than mineral oil, see §761.2. For provisions permitting reclassification of electrical equipment, including PCB Transformers, containing ≥ 500 ppm PCBs to PCB-Contaminated Electrical Equipment, see §761.30(a) and (h).

PCB waste(s) means those PCBs and PCB Items that are subject to the disposal requirements of subpart D of this part.

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