

<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

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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 CONTAINERS AND CONCENTRATION OF PCBS

DATE: OCTOBER 23, 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 Ted Hopkins 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 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, contact me at “Paul_W_Martin@rl.gov” or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 10/23/14

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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.

FROM: Paul W. Martin

DATE: 10/23/14

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