

<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
1199. PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 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 ANALYTICAL WASTE DISPOSAL REQUIREMENTS

DATE: OCTOBER 27, 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>
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TWO MINUTE TRAINING

SUBJECT: PCB Analytical Waste Disposal Requirements

Q: A customer has a laboratory that analyzes various waste streams that can include wastes with ≥ 50 ppm PCBs. The customer would like to know the basic disposal options for PCB analytical wastes. How are laboratory wastes that contain regulated PCBs required to be disposed?

A: There are basically four types of PCB wastes that can be generated from PCB analytical activities. These include: 1) sample portions from which PCBs are extracted, 2) liquid PCB wastes, 3) non-liquid PCB wastes and 4) any unused PCB sample material.

Per [40 CFR 761.64](#), "*Disposal of wastes generated as a result of research and development activities authorized under §40 CFR 761.30(j) and chemical analysis of PCBs*", the basic disposal requirements for the above four general types of PCB analytical wastes are as follows:

1. Portions of samples from which PCBs are extracted for PCB analytical purposes are unregulated for PCB disposal. This makes sense since all the PCBs have been extracted from that sample portion. If a lab process did not extract all the PCBs in the sample portion, the corresponding analytical results would be inaccurate, i.e., indicate a lower PCB concentration than is actually present in the sample.
2. Liquid PCB analytical wastes ≥ 0.5 ppb at the time of disposal are regulated for PCB disposal and must be thermally treated, or treated by an alternative method equivalent to thermal treatment, or decontaminated, or treated per a risk-based disposal approval (RBDA). Most likely, regulated PCB liquid analytical wastes will be disposed in a TSCA approved incinerator.
3. Nonliquid PCB analytical wastes regardless of concentration are regulated for PCB disposal and must be disposed of in the same manner as non-liquid cleaning materials and personal protective equipment waste. These types of wastes can be disposed in a TSCA PCB approved landfill, a RCRA approved landfill or a State approved municipal or non-municipal landfill, i.e., the local landfill.
4. Unused PCB sample wastes are regulated for PCB disposal in the same manner as the original PCB source material. If the source material was a PCB remediation wastes, a PCB bulk product waste, or a PCB waste, etc., those particular disposal requirements apply to the unused PCB sample waste.

SUMMARY:

- Sample portions from which PCBs are extracted for analytical purposes are not regulated.
- Liquid analytical wastes ≥ 0.5 ppb must be thermally treated, alternatively treated, or treated per an RBDA.
- Nonliquid analytical wastes regardless of PCB concentration must be disposed in a TSCA, RCRA or State approved landfill.
- Unused PCB sample wastes must be disposed in the same manner as the original PCB source material.

Excerpts from 40 CFR 761.64 and [40 CFR 761](#) are attached to the e-mail. If you have any questions, please contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 10/27/16

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Analytical Waste Disposal Requirements

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

This section provides disposal requirements for wastes generated during and as a result of research and development authorized under §761.30(j). This section also provides disposal requirements for wastes generated during the chemical analysis of samples containing PCBs under part 761, including §§761.30, 761.60, 761.61, 761.62, and 761.79. For determining the presence of PCBs in samples, chemical analysis includes: sample preparation, sample extraction, extract cleanup, extract concentration, addition of PCB standards, and instrumental analysis.

(a) Portions of samples of a size designated in a chemical extraction and analysis method for PCBs and extracted for purposes of determining the presence of PCBs or concentration of PCBs are unregulated for PCB disposal under this part.

(b) All other wastes generated during these activities are regulated for disposal based on their concentration at the time of disposal as follows:

- (1) **Liquid wastes**, including rinse solvents, must be disposed of according to §761.61(a)(5)(iv).
- (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).

40 CFR Part 761.61 PCB Remediation Waste

(a) *Self-implementing on-site cleanup and disposal of PCB remediation waste.*

(5) *Site cleanup.*

(iv) **Liquids**. Any person disposing of liquid PCB remediation waste shall either:

(A) Decontaminate the waste to the levels specified in §761.79(b)(1) or (b)(2).

(B) Dispose of the waste in accordance with paragraph (b) [*thermal treatment/ alternative treatment equivalent to thermal*] of this section or an approval issued under paragraph (c) [*risk-based disposal*] of this section.

(v) *Cleanup wastes.*

(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 [*General Records and Reports*] and K [*PCB waste disposal records and reports*] of this part:

- (1) A facility permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter.
- (2) A facility permitted, licensed, or registered by a State to manage non-municipal non-hazardous waste subject to §§257.5 through 257.30 of this chapter, as applicable.
- (3) A hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
- (4) A PCB disposal facility approved under this part.

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