

<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
1075. Hazardous Debris and Radioactively Contaminated Cadmium Batteries	ENCORE	SEP 3, 2015
1076. Hazardous Debris and Radioactively Contaminated Lead Acid Batteries	ENCORE	SEP 10, 2015
1077. Mercury Wet Cell Batteries - Debris or Not Debris	ENCORE	SEP 17, 2015
1078. Hazardous Debris and Non-Radioactive Lead Acid Batteries		SEP 24, 2015
1079. Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE	OCT 1, 2015
1080. CAS Numbers and the Hazardous Waste "U" and "P" Listings	ENCORE	OCT 8, 2015
1081. Universal Waste One Year Accumulation and Multiple Handlers	ENCORE	OCT 15, 2015
1082. LDR Notifications and F001-F005 Constituents of Concern	ENCORE	OCT 29, 2015
1083. LDR Notifications and F001-F005 Constituents of Concern – Again	ENCORE	NOV 5, 2015
1084. LDR Notifications and F001-F005 Constituents of Concern - One Last Time	ENCORE	NOV 12, 2015
1085. DOT and Terminal Protection of Alkaline Batteries	ENCORE	NOV 19, 2015
1086. Used Oil and Keeping Containers Closed – WAC 173-303 vs. 40 CFR 279		NOV 24, 2015
1087. PCB Weight Determinations	ENCORE	DEC 3, 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 WEIGHT DETERMINATIONS

DATE: DECEMBER 3, 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 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 Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters 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 Linda Petersen Fred Ruck 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 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 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 Jay Warwick Kyle Webster Jeff Westcott Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: PCB Weight Determinations

Q: A customer has laboratory standards consisting of 200 ppm PCBs. After a period of time, 20 gallons of waste PCB standard has accumulated. Per [40 CFR 761.180](#), anyone accumulating 99.4 lbs. of PCBs must maintain a PCB annual document log showing the disposition of the PCB material. A consultant of dubious character contends that only the weight of the PCB molecules themselves is the regulated amounts and since 200 ppm equals a mere 1/2 ounce, the annual document log is not required. The customer contends that the weight of the entire material is the regulated amount and since the entire 20 gallons of PCB waste equals 160 lbs., the annual document log is required. The customer has asked, "Who is right"?

A: The customer is always right. 40 CFR 761.180 states that each owner or operator of a facility using or storing at any one time at least 99.4 pounds of PCBs contained in PCB Containers shall develop and maintain at the facility all annual records and the written annual document log of the disposition of PCBs and PCB Items. 40 CFR 761.180 does not detail whether the weight is the molecular weight of the PCBs or the weight of the entire substance. However, [40 CFR 761.1\(b\)\(6\)](#) states:

"Unless otherwise specified, references to weights or volumes of PCBs in this part apply to the total weight or total volume of the material (oil, soil, debris, etc.) that contains regulated concentrations of PCBs, not the calculated weight or volume of only the PCB molecules contained in the material."

As further clarification, a guidance memo from EPA dated June 29, 1989 states:

"When calculating the weights of PCBs pursuant to the recordkeeping requirements of 40 CFR 761.180, the calculated weight is that of the entire substance (oil, gravel, dirt, etc.) contaminated with the PCB molecule, not the weight of only the PCB molecules within that substance."

And to eliminate any confusion, EPA stated in the [June 29, 1998, Federal Register](#) on page 35390:

"EPA is finalizing language in today's final rule at §761.1(b)(6) to eliminate any confusion on the application of weights or volumes cited in the rule. Unless otherwise noted in the regulations, references to weights or volumes in part 761 apply to the total weight or volume of the PCB containing material (oil, soil, etc.), not the calculated weight or volume of only the PCB molecules with that substance."

Since the customer's PCB waste exceeds the 99.4 lb. limit based on the total weight of PCBs, an annual document log detailing the disposition (i.e. manifests, Certificates of Disposal, PCB weights in kilograms, out of service dates, records of telephone calls for receipt verification) must be maintained and available for inspection by the State and Federal agencies upon request.

SUMMARY:

- If a person exceeds 99.4 lbs of PCB material (approximately 8 gallons of liquid PCBs), an annual document log is required.
- An annual document log must be maintained at the facility and made available upon request for agency inspections.
- The weight of PCBs is determined by the weight of the entire material and not just the weight of the PCB constituents.

The EPA guidance memo dated June 29, 1989 and 40 CFR 761.1(b)(6) 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: 12/3/15

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Weight Determinations

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 29, 1989

Gary R. Gamble
Environmental Compliance Specialist
J. F. Sato and Associates
1667 Cole Blvd., Suite 285
Golden, CO 80401

Dear Mr. Gamble:

This is in response to your letter of June 26, 1989 requesting a written interpretation of the Toxic Substances Control Act (TSCA) regulations set out in 40 CFR 761.180(a) regarding the determination of weights of PCBs in PCB Containers and PCB Transformers. Specifically, you ask that when the weights of PCBs are required for the annual document is one to calculated only the weight of the PCB molecules contained in the PCB Container or PCB Transformer or is it the weight of the entire substance i.e., oil, gravel, dirt, etc., within the PCB Container or PCB Transformer.

When calculating the weights of PCBs pursuant to the recordkeeping requirements of 40 CFR 761.180(a) the calculated weight is that of the entire substance (oil, gravel dirt, etc.) contaminated with the PCB molecule, not the weight of only the PCB molecules within that substance.

If you have any further questions or comments on this issue or any other issue concerning the PCB regulations under TSCA you may call me at 202-382-3964 or Tom Simons of my staff at 202-382-3788.

Sincerely,

John H. Smith, Acting Chief
Chemical Regulation Branch

40 CFR §761.1 Applicability

(a) This part establishes prohibitions of, and requirements for, the manufacture, processing, distribution in commerce, use, disposal, storage, and marking of PCBs and PCB Items.

(b) (6) Unless otherwise specified, references to weights or volumes of PCBs in this part apply to the total weight or total volume of the material (oil, soil, debris, etc.) that contains regulated concentrations of PCBs, not the calculated weight or volume of only the PCB molecules contained in the material.

FROM: Paul W. Martin

DATE: 12/3/15

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PG: 2

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