

<u>SUBJECT</u>		<u>DATE</u>
1232. Used Oil, Secondary Containment and Response to Spills	ENCORE	JUN 15, 2017
1233. Used Oil and Keeping Containers Closed – Washington State vs. The Feds	ENCORE	JUN 21, 2017
1234. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries	ENCORE	JUN 29, 2017
1235. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 6, 2017
1236. Conditioned Exclusion for Characteristic Debris Treated via Immobilization	ENCORE	JUL 13, 2017
1237. Office Waste and RCRA Regulatory Status	ENCORE	JUL 20, 2017
1238. Office Waste Management	ENCORE	JUL 27, 2017
1239. RCRA EPA Identification Numbers – Site Specifics	ENCORE	AUG 3, 2017
1240. RCRA EPA Identification Numbers – Transporters		AUG 9, 2017
1241. Laboratory Standards and Applicability of the "U" or "P" Hazardous Waste Listings	ENCORE	AUG 17, 2017
1242. Laboratory Standards and Applicability of the "F" Listings	ENCORE	AUG 24, 2017
1243. Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	AUG 31, 2017
1244. F Listings and Ingredients in Commercial Chemical Product Formulations		SEP 7, 2017
1245. LDR Waste That is Both Listed and Characteristic Hazardous Wastes	ENCORE	SEP 14, 2017
1246. Mercury Wet Cell Batteries - Debris or Not Debris?	ENCORE	SEP 21, 2017
1247. The "POLYM" Alternative Treatment Standard for Certain D001 Hazardous Wastes	ENCORE	SEP 28, 2017
1248. Elementary Neutralization and RCRA Requirements	ENCORE	OCT 5, 2017
1249. LDR Treatment Standards – Waste-Specific vs. Alternative		OCT 12, 2017
1250. Hazardous Debris and Non-Intact Lead-Acid Batteries	ENCORE	OCT 19, 2017
1251. Satellite Accumulation and "At or Near"	ENCORE	OCT 26, 2017
1252. Unmanifested Waste vs. Manifest Discrepancy	ENCORE	NOV 2, 2017
1253. Washington State Used Oil and Mixtures with Other Materials		NOV 9, 2017
1254. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1255. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1256. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1257. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1258. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017

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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:** FLUORESCENT LIGHT BALLASTS AND PCB ANNUAL REPORTING

**DATE:** DECEMBER 14, 2017

<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 Rene Catlow Richard Clinton Larry Cole John Dent Lorna Dittmer Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Ted Hopkins Sasa Kosjerina Jim Leary Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane 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 Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Marty 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:** Fluorescent Light Ballasts and PCB Annual Reporting

**Q:** In last week's Two Minute Training (2MT), the customer disposed of PCB ballasts with PCBs in the potting material as PCB Bulk Product Wastes. The customer knows that certain PCB Bulk Product Wastes such as plastic vehicle parts, applied dried paints, non-liquid building demolition debris, etc., are not subject to the PCB annual report referenced in [40 CFR 761, Subpart K](#). Since fluorescent ballasts containing PCBs in the potting material are regulated for disposal as PCB Bulk Product Wastes, does this mean that these types of ballasts do not have to be reported?

**A:** Maybe.

A review of [40 CFR 761.62\(b\)\(1\)](#) confirms no references to "fluorescent" or "ballasts". However, 761.62(b)(1) allows for other PCB Bulk Product Waste to be disposed under paragraph (b) but only if the other waste, such as these PCB ballasts, meets the leachate test under 761.62(b)(1)(i).

Also, 40 CFR 761.62(b)(2) allows for the disposal of PCB Bulk Product Waste other than those materials meeting paragraph (b)(1) if the material, such as these PCB ballasts, are segregated from organic liquid disposed in a municipal landfill, and the landfill leachate is collected and monitored for PCBs. If the conditions in (b)(1) or (b)(2) are met, these PCB ballasts can be managed under 40 CFR 761.62(b). Then under 761.62(b)(6), subparts [C, "Marking or PCBs and PCB Items"](#); [J, "General Records and Reports"](#); and [K, "PCB Waste Disposal Records and Records"](#); do not apply. Subpart J is specific to the annual document log and annual records that contribute to PCB annual report.

Therefore, if the customer's PCB ballast are sampled and meet the leach test (<10 µg/L of water), or if the customer's PCB ballasts are disposed in a municipal landfill that segregates the PCB ballasts from organic liquids, and the landfill leachate is collected and monitored - then these PCB ballasts are not subject the PCB annual report of 40 CFR 761, Subpart K.

### SUMMARY:

- PCB Bulk Product Wastes disposed under 40 CFR 761.62(b) are not subject to PCB marking, manifesting or annual reports.
- Specified PCB Bulk Product Wastes in (b)(1)(i), e.g., applied dried paints, are not subject to PCB annual reports, etc.
- Other PCB Bulk Product Wastes in (b)(1)(ii) and (b)(2) may not be subject to PCB annual reports if a leach test is passed or if the landfill segregates from organic liquids and collects and monitors its leachate.

An excerpt from 40 CFR 761.62(b) is attached. If you have any questions, contact me at [Paul W. Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 12/14/17

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Fluorescent Light Ballasts and PCB Annual Reporting

### 40 CFR 761.62 Disposal of PCB bulk product waste

#### **(b) Disposal in solid waste landfills.**

(1) Any person may dispose of the following PCB bulk product waste in a facility permitted, licensed, or registered by a State as a municipal or non-municipal non-hazardous waste landfill:

(i) Plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; applied dried paints, varnishes, waxes or other similar coatings or sealants; caulking; Galbestos; non-liquid building demolition debris; or non-liquid PCB bulk product waste from the shredding of automobiles or household appliances from which PCB small capacitors have been removed (shredder fluff).

(ii) Other PCB bulk product waste, sampled in accordance with the protocols set out in subpart R of this part, that leaches PCBs at  $<10 \mu\text{g/L}$  of water measured using a procedure used to simulate leachate generation.

(2) Any person may dispose of PCB bulk product waste other than those materials meeting the conditions of paragraph (b)(1) of this section, (e.g., paper or felt gaskets contaminated by liquid PCBs in a facility that is permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter or non-municipal non-hazardous waste subject to §§257.5 through 257.30 of this chapter, as applicable, if:

(i) The PCB bulk product waste is segregated from organic liquids disposed of in the landfill unit.

(ii) Leachate is collected from the landfill unit and monitored for PCBs.

(3) Any release of PCBs (including but not limited to leachate) from the landfill unit shall be cleaned up in accordance with §761.61.

(4)

(i) Any person disposing off-site of PCB bulk product waste regulated under paragraph (b)(1) of this section at a waste management facility not having a commercial PCB storage or disposal approval must provide written notice to the facility a minimum of 15 days in advance of the first shipment from the same disposal waste stream. The notice shall state that the PCB bulk product waste may include components containing PCBs at  $\geq 50$  ppm based on analysis of the waste in the shipment or application of a general knowledge of the waste stream (or similar material) which is known to contain PCBs at those levels, and that the PCB bulk product waste is known or presumed to leach  $<10 \mu\text{g/L}$  PCBs.

(ii) Any person disposing off-site of PCB bulk product waste regulated under paragraph (b)(2) of this section at a waste management facility not having a commercial PCB storage or disposal approval must provide written notice to the facility a minimum of 15 days in advance of the first shipment from the same disposal waste stream and with each shipment thereafter. The notice shall state that the PCB bulk product waste may include components containing PCBs at  $\geq 50$  ppm based on analysis of the waste in the shipment or application of a general knowledge of the waste stream (or similar material) which is known to contain PCBs at those levels, and that the PCB bulk product waste is known or presumed to leach  $\geq 10 \mu\text{g/L}$  PCBs.

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** Fluorescent Light Ballasts and PCB Annual Reporting

(5) Any person disposing of PCB bulk product waste must maintain a written record of all sampling and analysis of PCBs or notifications made under this paragraph for 3 years from the date of the waste's generation. The records must be made available to EPA upon request.

(6) Requirements in subparts C, J, and K of this part do not apply to waste disposed of under paragraph (b) of this section.

Excerpts from 40 CFR 761 Table of Contents

### **Subpart C. Marking of PCBS and PCB Items**

- §40. Marking requirements
- §45. Marking formats

### **Subpart J. General Records and Reports**

#### **§180. Records and monitoring**

- §185. Certification program and retention of records by importers and persons generating PCBs in excluded manufacturing processes
- §187. Reporting importers and by persons generating PCBs in excluded manufacturing processes
- §193. Maintenance of monitoring records by persons who import, manufacture, process, distribute in commerce, or use chemicals containing inadvertently generated PCBs

### **Subpart K. PCB Waste Disposal Records and Reports**

- §202. EPA identification numbers
- §205. Notification of PCB waste activity (EPA Form 7710-53)
- §207. The manifest-general requirements
- §208. Obtaining manifests
- §209. Number of copies of a manifest
- §210. Use of the manifest-Generator requirements
- §211. Manifest system-Transporter requirements
- §212. Transporter compliance with the manifest
- §213. Use of manifest-Commercial storage and disposal facility requirements
- §214. Retention of manifest records
- §215. Manifest discrepancies
- §216. Unmanifested waste report
- §217. Exception reporting
- §218. Certificate of disposal
- §219. One-year exception reporting

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