

<u>SUBJECT</u>		<u>DATE</u>
1320. Treated Hazardous Waste Used as Dust Suppressant		FEB 28, 2019
1321. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	MAR 7, 2019
1322. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAR 14, 2019
1323. Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAR 21, 2019
1324. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAR 28, 2019
1325. PCB Decontamination Standard with No Decontamination Performed	ENCORE	APR 4, 2019
1326. PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE	APR 11, 2019
1327. PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE	APR 18, 2019
1328. PCB Concentrations and Micrograms per Centimeters Squared (µg/cm <sup>2</sup> )	ENCORE	APR 25, 2019
1329. Operating Record vs. Operating Log	ENCORE	MAY 2, 2019
1330. Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE	MAY 9, 2019
1331. Washington State Used Oil and Mixtures with Other Materials	ENCORE	MAY 16, 2019
1332. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	MAY 23, 2019
1333. Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE	MAY 30, 2019
1334. Universal Waste Alkaline Batteries and Self-Transportation	ENCORE	JUN 6, 2019
1335. Universal Waste Lithium Batteries and Self-Transportation	ENCORE	JUN 13, 2019
1336. RCRA Hazard Labeling – A Random Scenario		JUN 20, 2019
1337. Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE	JUN 27, 2019
1338. Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE	JUL 3, 2019
1339. The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE	JUL 11, 2019
1340. Central Accumulation Areas and Signage Requirements		JUL 18, 2019
1341. RCRA EPA Identification Numbers – Site Specifics	ENCORE	JUL 25, 2019
1342. RCRA EPA Identification Numbers – Transporters	ENCORE	AUG 1, 2019
1343. Paint Wastes and the Applicability of the F001-F005 Listings to Ingredients	ENCORE	AUG 8, 2019
1344. F Listings and Ingredients in Commercial Chemical Product Formulations	ENCORE	AUG 15, 2019
1345. PCB Containers and ≥50 ppm	ENCORE	AUG 22, 2019
1346. CERCLA Hazardous Substances – The Petroleum Exclusion	ENCORE	AUG 29, 2019
1347. PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE	SEP 5, 2019
1348. RCRA LR One-Year Storage Prohibition vs., PCB One-Year Disposal Time Limit		SEP 12, 2019
1349. Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978	ENCORE	SEP 19, 2019
1350. Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978 – A Follow-Up		SEP 26, 2019
1351. PCB Waste Regulation and April 18, 1978 vs. July 2, 1979		OCT 3, 2019
1352. PCB Waste Storage Limitations and the One-Year Extension	ENCORE	OCT 10, 2019
1353. PCB Waste Storage Limitations and the PCB Radioactive Waste Exemption	ENCORE	OCT 17, 2019
1354. LDR One-Year Storage Prohibition and Generator Permitted Storage	ENCORE	OCT 24, 2019
1355. LDR Notification/Certification and Generator Permitted Storage		OCT 31, 2019
1356. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	NOV 7, 2019
1357. Fluorescent Light Ballasts and PCB Annual Reporting	ENCORE	NOV 14, 2019
1358. Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE	NOV 21, 2019
1359. Multiple Characteristic and Listed Hazardous Waste Codes and the “in lieu of” LDR Principle	ENCORE	NOV 26, 2019
1360. Universal Waste Lamps and Prohibition on Crushing	ENCORE	DEC 5, 2019
1361. Used Oil and Weekly Inspections	ENCORE	DEC 12, 2019
1362. Used Oil and Keeping Containers Closed – Washington State vs. the Feds	ENCORE	DEC 19, 2019
1363. ‘Twas the Night Before Christmas – The Twenty-Sixth Annual Edition		DEC 24, 2019
1364. Generator Weekly Inspection Log Documentation – Federal vs. WA State	ENCORE	JAN 2, 2020
1365. PCB Reporting and Recordkeeping Relief	ENCORE	JAN 9, 2020

## TWO MINUTE TRAINING

**TO:** CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** PCB REPORTING AND RECORDKEEPING RELIEF

**DATE:** JANUARY 9, 2020

<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 Laura Cusack John Dent Lorna Dittmer Stuart Hildreth Mike Jennings Stephanie Johansen Sasa Kosjerina Melvin Lakes Richard Lipinski Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jeff Westcott	Jeff Bramson Bob Bullock Frank Carleo Danielle Collins Bill Cox Jeanne Elkins Ryan Fisher Jonathan Fullmer Ted Hopkins Barry Lawrence Jim Leary Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Linda Petersen Fred Ruck Sean Sexton Dave Shea Ray Swenson Kat Thompson Wayne Toebe Eric Trotta Daniel Turlington Dave Watson	Brett Barnes Michael Carlson Mike Demiter Kip George Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Matt Mills Carly Nelson Michelle Oates Eric Pennala Jon Perry Christina Robison Christian Seavoy David Shaw John Skogle John Strickling Lana Strickling Greg Sullivan	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter Al Farabee Tony McKarns	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Mike Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Kirk Peterson	Dan Saueressig Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** PCB Reporting and Recordkeeping Relief

**Q:** Subpart J of 40 CFR 761 contains reporting and recordkeeping requirements that apply to PCBs, PCB Items, and to PCB storage and PCB disposal facilities, subject to the TSCA requirements. Basically this means that if something is regulated by TSCA for PCBs, then the PCB annual document log and the PCB annual records of Subpart J apply. Do the TSCA regulations provide any relief from the requirements of Subpart J concerning PCB annual reporting and PCB recordkeeping?

**A:** Yes, there is relief! Specifically there are seven references to regulatory relief from the reporting and recordkeeping requirements of Subpart J. These include:

- PCB-Contaminated Articles ( $\geq 50$  ppm to  $< 500$  ppm) with no free-flowing liquids;
- Non-liquid Bulk PCB remediation wastes with PCB concentrations  $< 50$  ppm;
- Non-liquid PCB remediation cleanup wastes at any PCB concentration destined for disposal;
- PCB Bulk Product waste that is eligible for disposal in a solid waste landfill;
- Non-liquid PCB analytical wastes at any PCB concentration and destined for disposal;
- Non-liquid cleaning materials and personal protective equipment resulting from decontamination, and;
- Cleanup equipment used in the double wash/rinse method for decontaminating non-porous surfaces.

Note that all PCB wastes associated with the relief from Subpart J are non-liquids and generally eligible for disposal in a municipal solid waste landfill. Also, note that unless the TSCA regulations specifically provide relief from Subpart J, no relief from reporting and recordkeeping is provided. A customer may have a PCB remediation waste with a PCB concentration of  $< 50$  ppm that is subject to minimal TSCA disposal requirements and not subject to any TSCA storage or marking requirements; nevertheless, reporting and recordkeeping would apply unless specific relief is provided by the TSCA regulations.

### SUMMARY:

- Most PCB regulated materials are subject to the reporting and recordkeeping requirements outlined in Subpart J of 40 CFR 761.
- However, the regulations provide some reporting relief via specific wording.
- Reporting relief includes - drained PCB Contaminated Articles; non-liquid bulk PCB remediation  $< 50$  ppm, non-liquid cleanup wastes from PCB remediation wastes; PCB Bulk Product waste eligible for solid waste landfill disposal; non-liquid PCB analytical wastes; non-liquid cleaning materials and PPE from decontamination; and cleanup equipment from the double washing/rinsing of non-porous surfaces.

Excerpts from 40 CFR 761 concerning relief from Subpart J 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:** 1/9/20

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** PCB Reporting and Recordkeeping Relief

### Subpart J—General Records and Reports

#### 40 CFR 761.180 Records and monitoring.

This section contains recordkeeping and reporting requirements that apply to PCBs, PCB Items, and PCB storage and disposal facilities that are subject to the requirements of the part.

#### 40 CFR 761.60(b)(6) Other PCB Articles.

(ii)(C) Requirements in subparts J and K of this part do not apply to PCB-Contaminated Articles from which all free-flowing liquids have been removed.

#### 40 CFR 761.61(a)(5) PCB Remediation Waste

(i)(B)(2)(ii) Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.

(v) Cleanup wastes. Any person generating the following wastes during and from the cleanup of PCB remediation waste shall dispose of or reuse them using one of the following methods:

(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 and K of this part:

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

(b) Disposal in solid waste landfills.

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

#### 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.

(b)(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).

**FROM:** Paul W. Martin

**DATE:** 1/9/20

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** PCB Reporting and Recordkeeping Relief

### 40 CFR 761.79 Decontamination standards and procedures.

(g)(6) 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 decontamination shall be disposed of in accordance with §761.61(a)(5)(v).

### 40 CFR 761.378 Decontamination, reuse, and disposal of solvents, cleaners, and equipment.

(c) Disposal. Dispose of all solvents, cleaners, and absorbent materials in accordance with §761.79(g). Dispose of equipment in accordance with §761.61(a)(5)(v)(A), or decontaminate in accordance with §761.79(b) or (c). Store for disposal equipment, solvents, cleaners, and absorbent materials in accordance with §761.65.