

<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

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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 DECONTAMINATION STANDARD WITH NO DECONTAMINATION PERFORMED

DATE: APRIL 4, 2019

<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 Eric Erpenbeck 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 Bill Cox Noah Cruz Jeanne Elkins Jonathan Fullmer Ted Hopkins Tad Karschnia Barry Lawrence Jim Leary Diane Leist Mitch Marrott Stewart McMahan Brian Mitcheltree Anthony Nagel Linda Petersen Fred Ruck Sean Sexton Dave Shea Ray Swenson Kat Thompson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Michael Carlson Mike Demiter Kip George Jerry Cammann Jeff Ehli 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 Skoglie Lana Strickling Greg Sullivan	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Tony McKarns	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Tom Gilmore Rob Gregory James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Kirk Peterson	Jean Quigley Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Ted Wooley

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TWO MINUTE TRAINING

SUBJECT: PCB Decontamination Standard with No Decontamination Performed

Q: A customer has a non-porous material (steel forks from a forklift) that had been contaminated with liquid PCBs ≥ 50 ppm. Prior to decontaminating the steel forks, the customer takes a standard wipe sample and the results are $8 \mu\text{g}/100 \text{ cm}^2$. Since the decontamination standard for a non-porous surface is $\leq 10 \mu\text{g}/100 \text{ cm}^2$, can the steel forks be excluded from TSCA for unrestricted use, even though no actual decontamination has occurred?

A: Per [40 CFR 761.30\(1\)\(u\)](#), it basically states that any person may use materials contaminated with PCBs ≥ 50 ppm if the materials were decontaminated, or if not previously decontaminated, the material now meets an applicable decontamination standard in [40 CFR 761.79\(b\)](#). According to 761.79(b), the decontamination standard for a non-porous surface such as steel is $\leq 10 \mu\text{g}/100 \text{ cm}^2$ based on the standard wipe test (40 CFR 761.123) at locations selected in accordance with [40 CFR 761, Subpart P](#), i.e., mapping a grid and flipping a coin.

This means that since the customer's analytical result for the steel forks was $8 \mu\text{g}/100 \text{ cm}^2$, the steel forks now meet the applicable decontamination standard of $\leq 10 \mu\text{g}/100 \text{ cm}^2$, and are eligible for unrestricted use, even though no actual decontamination had occurred. Note that if the analytical results had been $> 10 \mu\text{g}/100 \text{ cm}^2$, the steel forks would have required decontamination via an appropriate method in 40 CFR 761.79, (e.g., swabbing the forks with solvent and a double wash/rinse followed by appropriate disposal of the decontamination residues), in order to be eligible for unrestricted use. If the decontamination standard could not be achieved, then disposal as PCB remediation waste would be required.

SUMMARY:

- In general, PCB contaminated materials require decontamination for unrestricted use.
- However, even if not previously decontaminated, if the decontamination standard is met, unrestricted use is allowed.
- As always, if a decontamination standard cannot be met, appropriate disposal is required.

Excerpts from the [June 2014, PCB Question and Answer Manual](#), and 40 CFR 761.30 and 761.79 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: 4/4/19

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Decontamination Standard with No Decontamination Performed

EPA TSCA Question and Answer Manual, June 2014, Page 31

4 *Q: What does the provision in §761.30(u)(1)(ii) mean (stating that materials not previously decontaminated can be used if they meet a decontamination standard)?*

A: It means that the PCB concentration of the material meets one of the standards of §761.30(u) without further cleanup or decontamination.

40 CFR 761.30 Authorizations

(u) Use of decontaminated materials.

(1) Any person may use equipment, structures, other non-liquid or liquid materials that were contaminated with PCBs during manufacture, use, servicing, or because of spills from, or proximity to, PCBs ≥ 50 ppm, including those not otherwise authorized for use under this part, provided:

(i) The materials were decontaminated in accordance with:

(A) A TSCA PCB disposal approval issued under subpart D of this part;

(B) Section 761.79; or

(C) Applicable EPA PCB spill cleanup policies (e.g., TSCA, RCRA, CERCLA, EPA regional) in effect at the time of the decontamination; or

(ii) If not previously decontaminated, the materials now meet an applicable decontamination standard in § 761.79(b).

(2) No person shall use or reuse materials decontaminated in accordance with paragraph (u)(1)(i) of this section or meeting an applicable decontamination standard in paragraph (u)(1)(ii) of this section, in direct contact with food, feed, or drinking water unless otherwise allowed under this section or this part.

(3) Any person may use water containing PCBs at concentrations $\leq 0.5 \mu\text{g/L}$ PCBs without restriction.

(4) Any person may use water containing PCBs at concentrations $< 200 \mu\text{g/L}$ (i.e., < 200 ppb PCBs) for non-contact use in a closed system where there are no releases (e.g., as a non-contact cooling water).

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Decontamination Standard with No Decontamination Performed

40 CFR 761.79 Decontamination standards and procedures

(b) *Decontamination standards.* Chopping (including wire chopping), distilling, filtering, oil/water separation, spraying, soaking, wiping, stripping of insulation, scraping, scarification or the use of abrasives or solvents may be used to remove or separate PCBs, to the following standards, from liquids, concrete, or non-porous surfaces.

(1) The decontamination standard for water containing PCBs is:

- (i) Less than 200 µg/L (i.e., <200 ppb PCBs) for non-contact use in a closed system where there are no releases;
- (ii) For water discharged to a treatment works (as defined in §503.9(aa) of this chapter) or to navigable waters, <3 µg/L (approximately <3 ppb) or a PCB discharge limit included in a permit issued under section 307(b) or 402 of the Clean Water Act; or
- (iii) Less than or equal to 0.5 µg/L (i.e., approximately ≤0.5 ppb PCBs) for unrestricted use.

(2) The decontamination standard for organic liquids and non-aqueous inorganic liquids containing PCBs is <2 milligrams per kilogram (i.e., <2 ppm PCBs).

(3) The decontamination standard for non-porous surfaces in contact with liquid and non-liquid PCBs is:

(i) For unrestricted use:

(A) For non-porous surfaces previously in contact with liquid PCBs at any concentration, where no free-flowing liquids are currently present, ≤10 micrograms PCBs per 100 square centimeters (≤10 µg/100 cm²) as measured by a standard wipe test (§761.123) at locations selected in accordance with subpart P of this part.

(B) For non-porous surfaces in contact with non-liquid PCBs (including non-porous surfaces covered with a porous surface, such as paint or coating on metal), cleaning to Visual Standard No. 2, Near-White Blast Cleaned Surface Finish, of the National Association of Corrosion Engineers (NACE). A person shall verify compliance with standard No. 2 by visually inspecting all cleaned areas.

40 CFR Part 761, Subpart P Sampling Non-Porous Surfaces for Measurement-Based Use, Reuse, and on-Site or Off-Site Disposal Under §761.61(a)(6) and Decontamination Under §761.79(b)(3)

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