

<u>SUBJECT</u>		<u>DATE</u>
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
1366. Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 16, 2020
1367. TSDF Requirements When Shipping Dangerous Waste to another TSDF		JAN 23, 2020
1368. The Hazardous Waste Manifest Instructions – Where did they go?		JAN 30, 2020
1369. The Mixtures Rule – Washington State vs. The Feds	ENCORE	FEB 6, 2020
1370. Used Oil and the Rebuttable Presumption		FEB 13, 2020
1371. Used Oil, Secondary Containment and Response to Spills	ENCORE	FEB 20, 2020
1372. Used Oil Eligibility for Animal and Vegetable Oils	ENCORE	FEB 27, 2020
1373. Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils	ENCORE	MAR 5, 2020
1374. Mercury Wet Cell Batteries - Debris or Not Debris?	ENCORE	MAR 12, 2020
1375. Hazardous Debris and Non-Radioactive Lead-Acid Batteries	ENCORE	MAR 19, 2020
1376. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris	ENCORE	MAR 26, 2020
1377. MACRO encapsulation vs. macroencapsulation	ENCORE	APR 2, 2020
1378. PCB Storage for Disposal and RCRA ≤ 90 -Day Central Accumulation Areas	ENCORE	APR 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 STORAGE FOR DISPOSAL AND RCRA <90-DAY CENTRAL ACCUMULATION AREAS

DATE: APRIL 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 Barry Lawrence Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Linda Petersen Sean Sexton Dave Shea 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 Skogleie 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 Storage for Disposal and RCRA ≤90-Day Central Accumulation Areas

Q: A customer has PCB waste proposed for storage in a RCRA hazardous waste ≤90-day central accumulation area. The customer is aware that PCB waste can be compliantly stored in certain RCRA permitted or interim status facilities, but is not sure about RCRA ≤90-day central accumulation areas. Under what conditions can the customer store PCB waste in a RCRA hazardous waste ≤90-day central accumulation area in compliance with PCB storage for disposal requirements?

A: Per [40 CFR 761.65\(b\)\(1\)](#) PCB wastes can be stored for disposal in facilities basically with adequate roof, walls and floors; no drains or openings; well-constructed floors and curbing; and not located below the 100-year flood water elevation. Under (b)(1) these facilities have no RCRA specified requirements.

Then per 40 CFR 761.65(b)(2), as an alternative to (b)(1), PCB wastes can also be stored for disposal in RCRA facilities if the facilities are permitted by EPA or the State; or qualify for interim status standards. The RCRA units must meet permitted secondary containment, and the generator must clean up any PCB spills per the PCB spill cleanup policy at [40 CFR 761, Subpart G](#). PCB wastes stored in these types of RCRA facilities do not have to meet the design criteria of paragraph (b)(1), i.e., roof, walls and floors, etc., but the facilities have to be in compliance with their RCRA permits or interim status standards.

As further clarification, the [June 2014, TSCA EPA Question and Answer Manual](#) stated on page 113:

Q: Under §761.65(b), PCBs may be stored for disposal in areas meeting the requirements of RCRA §§3004, 3005, or 3006. May I store PCBs in accordance with the requirements for 90-day accumulation under RCRA (40 CFR 262.34 [now [40 CFR 262.17](#)])?

A: No. The allowance to store in a RCRA permitted facility does not include the 90-day generator storage provision or storage in satellite accumulation areas.

This means that in order for the customer to store PCBs in a RCRA ≤90-day central accumulation area, the area would have to meet the design criteria of paragraph (b)(1), i.e., roof, walls, floor, etc. Since the ≤90-day central accumulation area is excepted from having a RCRA permit or meeting interim status standards, paragraph 761.65(b)(2) cannot apply and the customer cannot store his PCB wastes based only on the accumulation area's RCRA ≤90-day status. Only if the ≤90-day central accumulation area has a roof, walls, floors, etc., can PCB waste be stored for disposal in compliance with 40 CFR 761.

SUMMARY:

- PCB wastes can be stored for disposal in any facility with a roof, walls, floor, etc.
- PCB wastes can also be stored for disposal in a permitted or interim status RCRA facility.
- A ≤90-day central accumulation area can store PCB wastes only if the area has a roof, walls, floor, etc.

40 CFR 761.65(b) is 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: 4/9/2020

FILE: 2MT\2020\040920.rtf

PG: 1

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Storage for Disposal and RCRA ≤90-Day Central Accumulation Areas

40 CFR §761.65 Storage for disposal

(b) Except as provided in paragraphs (b)(2), (c)(1), (c)(7), (c)(9), and (c)(10) of this section, after July 1, 1978, owners or operators of any facilities used for the storage of PCBs and PCB Items designated for disposal shall comply with the following storage unit requirements:

(1) The facilities shall meet the following criteria:

- (i) Adequate roof and walls to prevent rain water from reaching the stored PCBs and PCB Items;
- (ii) An adequate floor that has continuous curbing with a minimum 6 inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container or 25 percent of the total internal volume of all PCB Articles or PCB Containers stored there, whichever is greater. PCB/radioactive wastes are not required to be stored in an area with a minimum 6 inch high curbing. However, the floor and curbing must still provide a containment volume equal to at least two times the internal volume of the largest PCB Container or 25 percent of the total internal volume of all PCB Containers stored there, whichever is greater.
- (iii) No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area;
- (iv) Floors and curbing constructed of Portland cement, concrete, or a continuous, smooth, non-porous surface as defined at § 761.3, which prevents or minimizes penetration of PCBs.
- (v) Not located at a site that is below the 100-year flood water elevation.

(2) No person may store PCBs and PCB Items designated for disposal in a storage unit other than one approved pursuant to paragraph (d) of this section or meeting the design requirements of paragraph (b) of this section, unless the unit meets one of the following conditions:

- (i) Is permitted by EPA under section 3004 of RCRA to manage hazardous waste in containers, and spills of PCBs are cleaned up in accordance with subpart G of this part.
- (ii) Qualifies for interim status under section 3005 of RCRA to manage hazardous waste in containers, meets the requirements for containment at § 264.175 of this chapter, and spills of PCBs are cleaned up in accordance with subpart G of this part.
- (iii) Is permitted by a State authorized under section 3006 of RCRA to manage hazardous waste in containers, and spills of PCBs are cleaned up in accordance with subpart G of this part.
- (iv) Is approved or otherwise regulated pursuant to a State PCB waste management program no less stringent in protection of health or the environment than the applicable TSCA requirements found in this part.
- (v) Is subject to a TSCA Coordinated Approval, which includes provisions for storage of PCBs, issued pursuant to § 761.77.
- (vi) Has a TSCA PCB waste management approval, which includes provisions for storage, issued pursuant to § 761.61(c) or § 761.62(c).