

<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 $\geq 50$ 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. <b>MACRO</b> encapsulation vs. macroencapsulation	ENCORE	APR 2, 2020
1378. PCB Storage for Disposal and RCRA $\leq 90$ -Day Central Accumulation Areas	ENCORE	APR 9, 2020
1379. The PCB Mark and PCB Storage for Disposal Areas	ENCORE	APR 16, 2020
1380. PCB Containers and Multiple Removed From Service Dates	ENCORE	APR 23, 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 CONTAINERS AND MULTIPLE REMOVED FROM SERVICE DATES

**DATE:** APRIL 23, 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 Skogle John Skogle 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 Containers and Multiple Removed From Service Dates

**Q:** A customer has been accumulating multiple polychlorinated biphenyl (PCB) waste items in a PCB container. Each PCB item has its own date removed from service (DRFS) as required by [40 CFR 761.65\(c\)\(8\)](#). Does the customer need to mark each individual DRFS on the PCB container or just the oldest DRFS?

**A:** 40 CFR 761.65(c)(8) states:

*"PCB Items shall be dated on the item when they are removed from service for disposal. The storage shall be managed so that the PCB Items can be located by this date."*

Then per [40 CFR 761.3](#), "Definitions", the term PCB item is defined as:

*"...any PCB Article, PCB Article Container, PCB Container, PCB Equipment, or anything that deliberately or unintentionally contains or has as a part of it any PCB or PCBs."*

So far, the regulations have not been definitive on how to apply the DRFS marking and whether multiple DRFS markings or just the oldest DRFS marking are required.

However, [40 CFR 761.180](#), "Records and Monitoring" at 40 CFR 761.180(a)(2)(ii)(C) it states that the written annual document log for PCB containers will include, "the first date material placed in each PCB container was removed from service for disposal". This wording seems to imply that the PCB container should be marked with the first, i.e., oldest DRFS. Similar wording is present at [40 CFR 761.207](#) concerning manifesting

As further supporting information, the 1998 Response to Comments ([OPPTS Docket #66009A](#)) to the [June 29, 1998, Federal Register](#) for the PCB "Mega Rule", included the following response on page 167 from EPA:

*"Response 2: The commenter's proposed change does not alter the meaning of the regulatory language. The commenter seems to believe that EPA is imposing a new requirement that each individual article in an article container be dated. This is not the case. **Provided an article container is dated with the date the first contained article was removed from service, each individual article contained is considered to be covered by, and subject to, the date on the article container. This has always been EPA's policy on §761.65(b)(8).**"*

[The reference to "§761.65(b)(8)" is a typo and should read as "§761.65(c)(8)" since there was no (b)(8) before or after the PCB Mega Rule amendments. PWMartin comment]

The highlighted wording is relatively clear that a PCB container accumulating multiple PCB items must be marked with the oldest DRFS, which makes sense in terms of the one-year time limit on disposal. If a PCB container has multiple PCB items, the PCB container would have to be disposed within one year of the oldest DRFS.

Note that nothing in the regulations or the guidance would prevent the customer from marking all the DRFSs for each accumulated PCB item on the PCB container, as long as the oldest DRFS was also marked on the PCB container; however, only the oldest DRFS mark is required.

### SUMMARY:

- PCB items, which includes PCB containers, must be dated with a Date Removed from Service.
- If a PCB container is accumulating multiple PCB items, the oldest DRFS must be marked on the PCB container.
- The customer could mark all DRFSs on a PCB container, as long as the oldest DRFS is marked.

Excerpts from 40 CFR 761.65, 761.180 and 761.207 are attached to the e-mail. 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:** 4/23/2020

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** PCB Containers and Multiple Removed From Service Dates

### 40 CFR 761.65 Storage for disposal

(c)(8) PCB Items shall be dated on the item when they are removed from service for disposal. The storage shall be managed so that the PCB Items can be located by this date. Storage containers provided in paragraph (c)(7) of this section, shall have a record that includes for each batch of PCBs the quantity of the batch and date the batch was added to the container. The record shall also include the date, quantity, and disposition of any batch of PCBs removed from the container.

### 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.

(a)(2) The written annual document log shall include the following:

- (i) The name, address, and EPA identification number of the facility covered by the annual document log and the calendar year covered by the annual document log.
- (ii) The unique manifest number of every manifest generated by the facility during the calendar year, and from each manifest and for unmanifested waste that may be stored at the facility, the following information:
  - (A) For bulk PCB waste (e.g., in a tanker or truck), its weight in kilograms, the first date it was removed from service for disposal, the date it was placed into transport for off-site storage or disposal, and the date of disposal, if known.
  - (B) The serial number (if available) or other means of identifying each PCB Article (e.g., transformer or capacitor), the weight in kilograms of the PCB waste in each transformer or capacitor, the date it was removed from service for disposal, the date it was placed in transport for off-site storage or disposal, and the date of disposal, if known.
  - (C) A unique number identifying each PCB Container, a description of the contents of each PCB Container, such as liquid, soil, cleanup debris, etc., including the total weight of the material in kilograms in each PCB Container, the first date material placed in each PCB Container was removed from service for disposal, and the date each PCB Container was placed in transport for off-site storage or disposal, and the date of disposal (if known).
  - (D) A unique number identifying each PCB Article Container, a description of the contents of each PCB Article Container, such as pipes, capacitors, electric motors, pumps, etc., including the total weight in kilograms of the content of each PCB Article Container, the first date a PCB Article placed in each PCB Article Container was removed from service for disposal, and the date the PCB Article Container was placed in transport for off-site storage or disposal, and the date of disposal (if known.)

### 40 CFR 761.207 The manifest-general requirements

(a) A generator who transports, or offers for transport PCB waste for commercial off-site storage or off-site disposal, and commercial storage or disposal facility who offers for transport a rejected load of PCB waste, must prepare a manifest on EPA Form 8700-22, and, if necessary, a continuation sheet, according to the instructions included in the appendix of 40 CFR Part 262. The generator shall specify:

- (1) For each bulk load of PCBs, the identity of the PCB waste, the earliest date of removal from service for disposal, and the weight in kilograms of the PCB waste. (Item 14-Special Handling Instructions box)
- (2) For each PCB Article Container or PCB Container, the unique identifying number, type of PCB waste (e.g., soil, debris, small capacitors), earliest date of removal from service for disposal, and weight in kilograms of the PCB waste contained. (Item 14-Special Handling Instructions box)

**FROM:** Paul W. Martin

**DATE:** 4/23/2020

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