

<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

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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 CONCENTRATIONS AND MICROGRAMS PER CENTIMETERS SQUARED ( $\mu\text{G}/\text{CM}^2$ )

**DATE:** APRIL 25, 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 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 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 Concentrations and Micrograms per Centimeters Squared ( $\mu\text{g}/\text{cm}^2$ )

**Q:** A customer takes a standard wipe sample of a PCB spill area that has been decontaminated...the customer hopes. The analytical results indicate a PCB concentration of  $9 \mu\text{g}/100 \text{ cm}^2$ . The customer is more familiar with PCB concentrations in parts per millions (PPM), i.e.,  $\geq 50$  ppm is regulated and  $< 50$  ppm is not regulated. Is this PCB spill area regulated or no longer regulated for PCBs?

**A:** Per [40 CFR 761.1\(b\)\(3\)](#) it basically states that most provisions in this part apply only if PCBs are present in concentrations above a specified level. Prohibitions that apply to PCBs at concentrations of:

- $< 50$  ppm apply also to contaminated surfaces at PCB concentrations of  $\leq 10 \mu\text{g}/100 \text{ cm}^2$ ,
- $\geq 50$  to  $< 500$  ppm apply also to contaminated surfaces at PCB concentrations of  $> 10 \mu\text{g}/100 \text{ cm}^2$  to  $< 100 \mu\text{g}/100 \text{ cm}^2$ ,
- $\geq 500$  ppm apply also to contaminated surfaces at PCB concentrations of  $\geq 100 \mu\text{g}/100 \text{ cm}^2$ .

As further clarification, the [June 2014 EPA TSCA PCB Question and Answer Manual](#) on page 3 includes this table concerning a decontaminated PCB Transformer and the wipe sample concentrations:

If the concentration of the wipe sample is . . .	Then the transformer is regulated as . . .
$\leq 10 \mu\text{g}/100 \text{ cm}^2$	non-PCB
$> 10$ but $< 100 \mu\text{g}/100 \text{ cm}^2$	PCB-Contaminated
$> 100 \mu\text{g}/100 \text{ cm}^2$ PCB Transformer	PCB Transformer

Since the customer's standard wipe sample result was  $9 \mu\text{g}/100 \text{ cm}^2$ , which is below the  $\leq 10 \mu\text{g}/100 \text{ cm}^2$  threshold that equates to  $< 50$  ppm PCBs, the customer's spill area is considered nonregulated for PCBs, i.e., non-PCB.

### SUMMARY:

- $\leq 10 \mu\text{g}/100 \text{ cm}^2$  equals non-PCB or  $< 50$  ppm.
- $> 10$  but  $< 100 \mu\text{g}/100 \text{ cm}^2$  equals PCB-Contaminated or  $\geq 50$  ppm to  $< 500$  ppm.
- $> 100 \mu\text{g}/100 \text{ cm}^2$  equals PCB regulated or  $\geq 500$  ppm.

Excerpts from [40 CFR 761.3](#), [40 CFR 761.123](#) and the June 2014 PCB Q&A 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:** 4/25/19

**FILE:** 2MT\2019\042519.rtf

**PG:** 1

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** PCB Concentrations and Micrograms per Centimeters Squared ( $\mu\text{g}/\text{cm}^2$ )

### 40 CFR 761.3 Definitions

*PCB-Contaminated* means a non-liquid material containing PCBs at concentrations  $\geq 50$  ppm but  $< 500$  ppm; a liquid material containing PCBs at concentrations  $\geq 50$  ppm but  $< 500$  ppm or where insufficient liquid material is available for analysis, a non-porous surface having a surface concentration  $> 10 \mu\text{g}/100 \text{cm}^2$  but  $< 100 \mu\text{g}/100 \text{cm}^2$ , measured by a standard wipe test as defined in §761.123.

*Standard wipe sample* means a sample collected for chemical extraction and analysis using the standard wipe test as defined in §761.123. Except as designated elsewhere in part 761, the minimum surface area to be sampled shall be  $100 \text{cm}^2$ .

### 40 CFR Part 761.123 Definitions

*Standard wipe test* means, for spills of high-concentration PCBs on solid surfaces, a cleanup to numerical surface standards and sampling by a standard wipe test to verify that the numerical standards have been met. This definition constitutes the minimum requirements for an appropriate wipe testing protocol. A standard-size template ( $10 \text{cm} \times 10 \text{cm}$ ) will be used to delineate the area of cleanup; the wiping medium will be a gauze pad or glass wool of known size which has been saturated with hexane. It is important that the wipe be performed very quickly after the hexane is exposed to air. EPA strongly recommends that the gauze (or glass wool) be prepared with hexane in the laboratory and that the wiping medium be stored in sealed glass vials until it is used for the wipe test. Further, EPA requires the collection and testing of field blanks and replicates.

### June 2014 Version Revisions to the PCB Q and A Manual (June 2014)

#### §761.1(b)(3) Bulk and surface concentrations

2. **Q:** *May I characterize a drained transformer from which the core, coil, and all free-flowing liquids have been removed by taking a wipe sample from the inside surface of the transformer?*

**A:** Yes. However, the wipe sample results may only be used for purposes of disposal (i.e., the drained carcass is not authorized for use). Refer to the following table (§761.1(b)(3))

<b>If</b> the concentration of the wipe sample is . . .	<b>Then</b> the transformer is regulated as . . .
$\leq 10 \mu\text{g}/100 \text{cm}^2$	non-PCB
$> 10$ but $< 100 \mu\text{g}/100 \text{cm}^2$	PCB-Contaminated
$> 100 \mu\text{g}/100 \text{cm}^2$ PCB Transformer	PCB Transformer

**FROM:** Paul W. Martin

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**PG:** 2

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