

<u>SUBJECT</u>		<u>DATE</u>
1253. Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE	NOV 16, 2017
1254. PCB Radioactive Wastes and Exception Reporting	ENCORE	NOV 21, 2017
1255. Satellite Accumulation Requirements and Container Inspections	ENCORE	NOV 30, 2017
1256. Disposing of PCB Ballasts with PCB Potting Material	ENCORE	DEC 7, 2017
1257. Fluorescent Light Ballasts and PCB Annual Reporting		DEC 14, 2017
1258. 'Twas the Night Before Christmas – The Twenty-Fifth Annual Edition		DEC 21, 2017
1259. The Purpose of Keeping Containers Closed Except When Adding or Removing Wastes	ENCORE	DEC 28, 2017
1260. Satellite Accumulation and Product Vessel Cleanouts	ENCORE	JAN 4, 2018
1261. Conservative Declaration that Material is a Hazardous Waste	ENCORE	JAN 11, 2018
1262. Defining Criteria for Household Waste Exclusion	ENCORE	JAN 18, 2018
1263. The Household Waste Exclusion and Renovation Debris	ENCORE	JAN 25, 2018
1264. The Household Waste Exclusion and Renovation Debris – Part II	ENCORE	FEB 1, 2018
1265. The Mixtures Rule – Washington State vs. The Feds	ENCORE	FEB 8, 2018
1266. Spent Lead-Acid Batteries and Secondary Containment	ENCORE	FEB 15, 2018
1267. Spent Lead-Acid Batteries and Accumulation Time Limits	ENCORE	FEB 23, 2018
1268. CERCLA Hazardous Substances – A Brief Definition	ENCORE	MAR 1, 2018
1269. Radioactively Contaminated Lead-Acid Batteries and Hazardous Debris	ENCORE	MAR 8, 2018
1270. RCRA Treatment and the Two-Part Definition	ENCORE	MAR 15, 2018
1271. Who Wants to be a Generator!!!	ENCORE	MAR 22, 2018
1272. Who Wants to be a Generator Part 2!!!	ENCORE	MAR 29, 2018
1273. “No Smoking” Signs and Tobacco-Free Facilities		APR 5, 2018
1274. Aqueous Solutions and the Characteristic of Corrosivity	ENCORE	APR 12, 2018
1275. Aqueous Solutions and the Characteristic of Ignitability	ENCORE	APR 19, 2018
1276. PCB Bulk Product Wastes and the One Year Disposal Requirement	ENCORE	APR 26, 2018

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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 BULK PRODUCT WASTES AND THE ONE YEAR DISPOSAL REQUIREMENT

DATE: APRIL 26, 2018

<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 John Dent Lorna Dittmer Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Melvin Lakes Richard Lipinski Jim McGrogan Stuart Mortensen Dave Richards Phil Sheely Connie Simiele Jennie Stults Jeff Westcott Jeff Widney	Bob Bullock Bill Cox Laura Cusack Sasa Kosjerina Jim Leary Anthony Nagel Robert Nielson Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Daniel Turlington Dave Watson	Brett Barnes Jerry Cammann Jeff Ehlis Garin Erickson Panfilo Gonzalez Jr. Dashia Huff Mark Kamberg Jon McKibben Saul Martinez Jon Perry Christina Robison Lana Strickling Lou Upton	(TBD) <u>DOE RL, ORP, WIPP</u> Mary Beth Burandt Duane Carter Cliff Clark Tony McKarns Ellen Mattlin Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Megan Lerchen Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills 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 Bulk Product Wastes and the One Year Disposal Requirement

Q: A customer has PCB containing paint chips which meet the definition of a PCB Bulk Product waste. The customer is aware that certain PCB bulk product wastes like applied dried paints do not require the PCB markings, annual reports or manifesting. Since PCB bulk product wastes are not subject to markings, annual reporting or even manifesting, are PCB bulk product wastes still subject to the one year disposal and the date removed from service marking requirements?

A: Per [40 CFR 761.62\(b\)\(1\)\(i\)](#), the customer's waste paint chips are applied dried paints and therefore can be managed as PCB bulk product wastes. Then per 40 CFR 761.62(b)(6), PCB bulk product wastes such as applied dried paints are not subject to 40 CFR 761 [Subpart C](#), "Marking of PCB and PCB Items"; or [Subpart J](#), "General Records and Reports", e.g., annual reporting; or [Subpart K](#), "PCB Waste Disposal Records and Reports", e.g., manifesting.

Concerning the requirement to dispose of PCB waste within one year of the date removed from service, this requirement is referenced in 40 CFR 761 [Subpart D](#), "Storage and Disposal" at [40 CFR 761.65\(a\)\(1\)](#). Subpart D is not one of the PCB bulk product waste exempted subparts C, J, or K, therefore the one year disposal requirement applies to PCB bulk product wastes.

Concerning the requirement to mark the date removed from service on PCB items, this requirement is also referenced in 40 CFR 761 Subpart D at 40 CFR 761.65(c)(8). Therefore, the date removed from service marking applies to PCB bulk product wastes even though the waste is exempt from the PCB marking requirement, i.e., the yellow PCB sticker. Most PCB waste generators mark the date removed from service on the yellow PCB sticker, but the requirement is to mark the PCB item and not the PCB yellow sticker which does not include a date removed from service field.

As further clarification, the [2014 EPA TSCA Question and Answer Manual](#) on page 105 states:

Q: Does the requirement to dispose of PCB material within one year apply to PCB bulk product waste going to a state-approved landfill?

A: Yes. Any PCB waste regulated for clean-up must be disposed of within one year unless the EPA Regional Administrator grants an extension (see §761.65(a)).

SUMMARY:

- PCB bulk product waste is not subject to Subparts C (marking), J (annual reports) or K (manifesting).
- The date removed from service and the one year disposal requirements are found in Subpart D.
- Therefore, PCB bulk product wastes are subject to the date removed from service marking and the one year disposal requirements even though marking, reporting and manifesting do not apply.

Excerpts from 40 CFR 761.62 and 40 CFR 761.65 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: 4/26/18

FILE: 2MT\2018\042618.rtf

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Bulk Product Wastes and the One Year Disposal Requirement

Subpart D – Storage and Disposal

40 CFR §761.62 Disposal of PCB bulk product waste

(b) *Disposal in solid waste landfills.*

- (1) Any person may dispose of the following PCB bulk product waste in a facility permitted, licensed, or registered by State as a municipal or non-municipal non-hazardous waste landfill:
 - (i) Plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; **applied dried paints**, varnishes, waxes or other similar coatings or sealants; caulking; Galbestos; non-liquid building demolition debris; or non-liquid PCB bulk product waste from the shredding of automobiles or household appliances from which PCB small capacitors have been removed (shredder fluff).
 - (ii) Other PCB bulk product waste, sampled in accordance with the protocols set out in subpart R of this part, that leaches PCBs at <10 µg/L of water measured using a procedure used to simulate leachate generation.
- ...
- (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 §761.65 Storage for disposal

This section applies to the storage for disposal of PCBs at concentrations of 50 ppm or greater and PCB Items with PCB concentrations of 50 ppm or greater.

(a)

(1) *Storage limitations.* **Any PCB waste shall be disposed of as required by subpart D of this part within 1-year from the date it was determined to be PCB waste and the decision was made to dispose of it.** This date is the date of removal from service for disposal and the point at which the 1-year time frame for disposal begins. PCB/radioactive waste removed from service for disposal is exempt from the 1-year time limit provided that the provisions at paragraphs (a)(2)(ii) and (a)(2)(iii) of this section are followed and the waste is managed in accordance with all other applicable Federal, State, and local laws and regulations for the management of radioactive material.

(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.

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