

<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
1277. PCB Radioactive Wastes and Exception Reporting	ENCORE	MAY 3, 2018
1278. TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date	ENCORE	MAY 10, 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: TSCA/PCB DETERMINATIONS FOR FLUORESCENT LIGHT BALLASTS VIA THE MANUFACTURE DATE

DATE: MAY 10, 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: TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date

Q: A customer at a facility in existence since the 1960's has assorted fluorescent light ballasts destined for disposal. The ballasts range in age from the 1970's to the present. Using the manufacturer's date as opposed to analytical results, how can the customer determine which ballasts are subject to TSCA/PCB requirements and which ballasts are not?

A: [40 CFR 761.2\(a\)\(4\)](#) basically states that if the PCB concentration is not known, a person must assume that a capacitor (e.g., a fluorescent light ballast) contains ≥ 500 ppm PCBs - if the ballast was manufactured prior to July 2, 1979, or if the manufacturing date is unknown. EPA stated in the [June 29, 1998, Federal Register](#) on page 35389, bottom of 3rd column, that "*virtually all capacitors (large and small) manufactured prior to 1978 were filled with PCB fluid at a concentration near 100 percent. Capacitors manufactured after 1978 did not use PCB dielectric fluid*". [Note that the references to 1978 and July 2, 1979 are correct and not typos.]

Then, [40 CFR 761.40\(g\)](#) basically states that fluorescent light ballasts manufactured between July 1, 1978, and July 1, 1998, that do not contain PCBs must be marked "No PCBs" i.e., < 50 ppm. [40 CFR 761.2\(a\)\(4\)](#), which provides assumptions for use, but not disposal, confirms that a person may assume that a ballast marked at the time of manufacture with the statement "No PCBs" is not subject to TSCA. Also, the [June 2014 TSCA PCB Question and Answer Manual](#) states on page 41, concerning disposal of fluorescent light ballasts: "*It is acceptable to treat ballasts with this mark ["No PCBs"] as unregulated for PCBs.*"

Concerning fluorescent light ballast manufactured after July 1, 1998, these ballasts are no longer required to be marked "No PCBs". And since these ≥ 1998 ballasts were manufactured almost two decades after the PCB ban of 1978, it is appropriate to assume these ballasts are not PCB regulated.

SUMMARY:

- Fluorescent light ballasts manufactured:
 - ▶ Before 1978 are subject to TSCA regulation.
 - ▶ Between 1978 and 1998, and marked "No PCBs", are not subject to TSCA regulation, (other than having the "No PCBs" mark).
 - ▶ After 1998, and not marked "No PCBs", are not subject to TSCA regulation.

Excerpts from 40 CFR 761.40, 761.2, the PCB Q&A Manual and the 6/29/98 Federal Register are attached. If you have any questions, please contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: TSCA/PCB Determinations for Fluorescent Light Ballasts via the Manufacture Date

40 CFR 761.2 PCB concentration assumptions for use.

- (a)
- (4) Any person must assume that a capacitor manufactured prior to July 2, 1979, whose PCB concentration is not established contains ≥ 500 ppm PCBs. Any person may assume that a capacitor manufactured after July 2, 1979, is non-PCB (i.e., < 50 ppm PCBs). If the date of manufacture is unknown, any person must assume the capacitor contains ≥ 500 ppm PCBs. Any person may assume that a capacitor marked at the time of manufacture with the statement "No PCBs" in accordance with §761.40(g) is non-PCB.

40 CFR 761.40 Marking requirements.

- (g) Each large low voltage capacitor, each small capacitor normally used in alternating current circuits, and each fluorescent light ballast manufactured ("manufactured", for purposes of this sentence, means built) between July 1, 1978 and July 1, 1998 that do not contain PCBs shall be marked by the manufacturer at the time of manufacture with the statement, "No PCBs". The mark shall be of similar durability and readability as other marking that indicate electrical information, part numbers, or the manufacturer's name. For purposes of this paragraph marking requirement only is applicable to items built domestically or abroad after June 30, 1978.

June 2014 Version Revisions to the PCB Q and A Manual §761.50(b)(2) PCB Items

4 Q: *Can I assume that ballasts manufactured after 1979 are not contaminated?*

A: Fluorescent light ballasts manufactured between July 1, 1979, and July 1, 1998, at the time of manufacture were required to be marked by the manufacturer with the statement "No PCBs". It is acceptable to treat ballasts with this mark as unregulated for PCBs.

11 Q: *Is a ballast manufactured before 1978 regulated for disposal?*

A: Yes. Materials containing PCBs that were disposed of or otherwise released to the environment before April 18, 1978, are generally not regulated for disposal under the current regulatory requirements. However, products manufactured before April 18, 1978, that have been in use since that time are regulated for disposal under the current requirements.

Federal Register / Vol. 63, No. 124 / Monday, June 29, 1998 / Rules and Regulations

Page 35389

"As EPA noted on August 25, 1982, in the preamble to the final rule on use in electrical equipment (47 FR 37342 at 37347), 'virtually *all* capacitors (large and small) manufactured prior to 1978 were filled with PCB fluid at a concentration *near 100 percent*. Capacitors manufactured after 1978 did not use PCB dielectric fluid'. Data was provided to EPA in support of the 1982 electrical use rule by the Edison Electric Institute (EEI) and the Utilities Solid Waste Activities Group (USWAG). This data indicated that of approximately 2.8 million large capacitors in the utilities industry, *100%* contained PCBs at concentrations of 500 ppm or greater (47 FR 17426; at 17428)."

FROM: Paul W. Martin

DATE: 5/10/18

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