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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: RCRA EMPTY CONTAINERS VS. TSCA PCB DECONTAMINATED CONTAINERS - SCENARIO I

DATE: JUNE 11, 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: RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario I

Q: A customer has a drained 55-gallon waste drum that had contained a material regulated as a RCRA "F" listed non-acutely hazardous waste, and also as a TSCA PCB contaminated waste (PCB concentration ≥ 50 ppm and < 500 ppm). The customer wants to render this container RCRA empty and PCB decontaminated and then reuse the container for other wastes. The customer does not want to be concerned with "carry through" to subsequent wastestreams of any previous RCRA listed waste codes or PCB contamination. What must the customer do in order to render this drum reusable in terms of RCRA and TSCA PCB requirements?

A: In terms of RCRA, the customer must render the drum RCRA empty for a non-acutely hazardous waste. Per [WAC 173-303-160\(2\)](#) [[40 CFR 261.7](#)] the container must be emptied as much as possible and contain no more than 1 inch, or no more than 3% by volume of residues. Once this criteria is achieved for a non-acutely hazardous waste, the residues remaining in the RCRA empty container are no longer subject to RCRA [[WAC 173-303-160\(3\)](#)]. Note that the residues removed from the RCRA container remains an F listed hazardous waste.

In terms of TSCA PCB, the customer must decontaminate the drum for PCBs. Per [40 CFR 761.79\(c\)\(1\)](#) the PCB container must be triple rinsed with an appropriate solvent, as defined in [761.79\(d\)\(1\) - \(3\)](#). Each rinse volume must equal 10% of the PCB container's capacity. Once this criteria is achieved for a PCB container, the container can be used or reused as authorized at [40 CFR 761.30\(u\)](#). Note that the solvent rinsate must be managed as a PCB liquid per [40 CFR 761.60\(a\)](#). Also note that both RCRA and TSCA PCB "empty" criteria apply to liquids and non-liquids, and confirmation analyses is not required.

Since the customer has a container that formerly contained a RCRA "F" listed hazardous waste (non-acute), and a TSCA PCB contaminated waste, the customer must meet both the RCRA and TSCA requirements concerning rendering a drum RCRA empty and PCB decontaminated. In this specific case, if the customer decontaminated the drum for PCBs by triple rinsing the container, and completely emptying the rinsate, the drum would be empty/decontaminated and therefore reusable in terms of both RCRA and TSCA PCB.

SUMMARY:

- A RCRA non-acutely hazardous waste container is RCRA empty when emptied as much as possible and contains no more than 1 inch or no more than 3% by volume of residues.
- A TSCA PCB contaminated container is TSCA decontaminated when triple rinsed with an appropriate solvent and each rinse equals 10% of the drum's capacity.
- A RCRA/TSCA container meeting both of the above criteria is suitable for reuse.

Excerpts from WAC 173-303-160 and 40 CFR 761 are attached to the e-mail. If you have any questions, please contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario I

WAC 173-303-160 Containers.

(2) A container or inner liner is "empty" when:

(a) All wastes in it have been taken out that can be removed using practices commonly employed to remove materials from that type of container or inner liner (for example, pouring, pumping, aspirating, etc.) and:

- (i) No more than one inch of waste remains at the bottom of the container or inner liner; or
- (ii) No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size; or
- (iii) No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.

(3)

(a) Any residues remaining in containers or inner liners that are "empty" as described in subsection (2) of this section will not be subject to the requirements of this chapter, and will not be considered as accumulated wastes for the purposes of calculating waste quantities.

40 CFR 761.79 Decontamination standards and procedures.

(a) *Applicability.* This section establishes decontamination standards and procedures for removing PCBs, which are regulated for disposal, from water, organic liquids, non-porous surfaces (including scrap metal from disassembled electrical equipment), concrete, and non-porous surfaces covered with a porous surface, such as paint or coating on metal.

(3) Materials from which PCBs have been removed by decontamination in accordance with this section may be used or reused in accordance with §761.30(u).

(c) *Self-implementing decontamination procedures.* The following self-implementing decontamination procedures are available as an alternative to the measurement-based decontamination methods specified in paragraph (b) of this section. Any person performing self-implementing decontamination must comply with one of the following procedures.

(1) Any person decontaminating a PCB Container must do so by flushing the internal surfaces of the container three times with a solvent containing <50 ppm PCBs. Each rinse shall use a volume of the flushing solvent equal to approximately 10 percent of the PCB Container capacity.

40 CFR 761.30 Authorizations.

(u) *Use of decontaminated materials.*

(1) Any person may use equipment, structures, other non-liquid or liquid materials that were contaminated with PCBs during manufacture, use, servicing, or because of spills from, or proximity to, PCBs ≥50 ppm, including those not otherwise authorized for use under this part, provided:

(i) The materials were decontaminated in accordance with:

(B) Section 761.79; or...