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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 ≥ 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
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1360.	Universal Waste Lamps and Prohibition on Crushing	ENCORE DEC 5, 2019
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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.	MACRO encapsulation vs. macroencapsulation	ENCORE APR 2, 2020
1378.	PCB Storage for Disposal and RCRA ≤ 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
1381.	Contingency Plan Implementation and Small Spills of Hazardous Waste	APR 29, 2020
1382.	Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation	ENCORE MAY 7, 2020
1383.	The RCRA Definition of “Regulated Unit”	MAY 14, 2020
1384.	RCRA and New Point of Generation	MAY 21, 2020
1385.	The Alcohol Exclusion for Ignitable Hazardous Wastes	ENCORE MAY 28, 2020
1386.	PCB Certificates of Disposal and Manifesting Between Related Facilities	ENCORE JUN 4, 2020
1387.	RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario I	ENCORE JUN 11, 2020
1388.	RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE JUN 18, 2020

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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 II

DATE: JUNE 18, 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 II

Q: Last week's "Two Minute Training" (2MT) discussed requirements for rendering reusable, a drained 55-gallon waste container 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). What if the drained container had contained a material regulated as a RCRA "P" listed acutely hazardous waste, and a TSCA PCB waste (PCB concentration ≥ 500 ppm)? Again, the customer does not want to be concerned with "carry through" of any previous RCRA waste codes or PCB contamination to the subsequent waste streams. What must the customer do to render this container reusable per RCRA and TSCA requirements?

A: In terms of RCRA, the customer must render the container RCRA empty for an acutely hazardous waste. Per [WAC 173-303-160\(2\)](#) [[40 CFR 261.7](#)] the container can be rinsed at least three times with an appropriate cleaner or solvent. The volume of solvent used for each rinsing must be 10% or more of the container's capacity or of sufficient quantity to decontaminate thoroughly the container. Note that the residues removed from the RCRA empty container remain a P-listed hazardous waste.

In terms of TSCA, the customer must decontaminate the container for PCBs. Per [40 CFR 761.79\(c\)\(1\)](#) the container must be triple rinsed with an appropriate solvent, as defined in [761.79\(d\)\(1\) - \(3\)](#). Each rinse volume must equal approximately 10% of the PCB container's capacity. Once these criteria are achieved for a PCB container, the container can be used or reused as authorized at [40 CFR 761.30\(u\)](#). Note that the decontamination requirements are the same regardless of PCB concentration (≥ 50 to < 500 or ≥ 500), and very similar to the emptying requirements for a RCRA acutely hazardous waste. Also note that the solvent rinsate must be managed as a PCB liquid per [40 CFR 761.60\(a\)](#), i.e., thermal treatment.

Since the customer's container had contained a RCRA P-listed acutely hazardous waste, and a TSCA PCB waste, the customer must meet both the RCRA and TSCA requirements concerning rendering a container RCRA empty and PCB decontaminated. In this case, when the container is triple rinsed with appropriate types and volumes of solvents, the container would be reusable.

SUMMARY:

- A RCRA acutely hazardous waste container can be RCRA emptied when triple rinsed with an appropriate cleaner or solvent and each rinse equals 10% of the container's capacity or is of sufficient quantity to decontaminate thoroughly the container.
- A TSCA PCB container is TSCA decontaminated when triple rinsed with an appropriate solvent and each rinse equals approximately 10% of the container's capacity.
- A RCRA/TSCA container meeting both decontamination criteria is no longer subject to RCRA or TSCA regulation and is therefore suitable for reuse.

Excerpts from WAC 173-303-160 and 40 CFR 761 are attached to the e-mail. If you have any questions, 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 II

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...