

<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
1279. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	MAY 17, 2018
1280. Satellite Accumulation Areas and the Three-Day Time Limit for Excess Accumulation		MAY 24, 2018
1281. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit	ENCORE	MAY 31, 2018
1282. Universal Waste and Basis for the One Year Accumulation Time Limit	ENCORE	JUN 7, 2018
1283. F001 Degreaser versus F002 Solvent	ENCORE	JUN 14, 2018
1284. Hazardous Waste Determinations and Phase Separation	ENCORE	JUN 20, 2018
1285. PCB Certificates of Disposal and Manifesting Between Related Facilities		JUN 28, 2018
1286. PCB Concentrations and 10,000 PPM	ENCORE	JUL 5, 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 CONCENTRATIONS AND 10,000 PPM

**DATE:** JULY 5, 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 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 Concentrations and 10,000 PPM

**Q:** Most customers know the significance of the concentration  $\geq 50$  ppm PCB waste, i.e., it is regulated. Are there any instances where regulated PCB waste with concentrations at or near 10,000 ppm can be subject to other specific requirements in [40 CFR 761](#)?

**A:** Yes there are!

[40 CFR 761.60\(j\)\(1\)\(iii\)](#) concerns self-implementing requirements for research and development and limits the amount of material containing PCBs treated annually during R&D disposal activities to 500 gallons or 70 cubic feet and a maximum concentration of 10,000 ppm PCBs.

[40 CFR 761.79\(c\)\(3\)](#) concerns self-implementing decontamination procedures for non-porous surfaces in contact with free-flowing mineral oil dielectric fluid (MODEF) at levels  $\leq 10,000$  ppm PCBs.

40 CFR 761.79(c)(4) also concerns self-implementing decontamination procedures for non-porous surfaces in contact with free-flowing MODEF but at levels  $> 10,000$  ppm PCBs.

These were the only three instances referencing “10,000 ppm” PCBs in 40 CFR 761.

### SUMMARY:

- PCB wastes are generally regulated if concentration is  $\geq 50$  ppm.
- PCB wastes can have specific requirements if concentrations are in the 10,000 ppm range.
- There are three instances of PCB concentrations referencing 10,000 ppm and all concern self-implementing requirements for R&D or decontamination.

Excerpts from 40 CFR 761.60(j) and 40 CFR 761.79(c) are attached. 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:** 7/5/18

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** PCB Concentrations and 10,000 PPM

### 40 CFR §761.60 Disposal requirements

(j) *Self-implementing requirements for research and development (R&D) for PCB disposal.*

(1) Any person may conduct R&D for PCB disposal without prior written approval from EPA if they meet the following conditions:

- (i) File a notification and obtain an EPA identification number pursuant to subpart K of this part.
- (ii) Notify in writing the EPA Regional Administrator, the State environmental protection agency, and local environmental protection agency, having jurisdiction where the R&D for PCB disposal activity will occur at least 30 days prior to the commencement of any R&D for PCB disposal activity conducted under this section. Each written notification shall include the EPA identification number of the site where the R&D for PCB disposal activities will be conducted, the quantity of PCBs to be treated, the type of R&D technology to be used, the general physical and chemical properties of material being treated, and an estimate of the duration of the PCB activity. The EPA Regional Administrator, the State environmental protection agency, and the local environmental protection agency may waive notification in writing prior to commencement of the research.
- (iii) The amount of material containing PCBs treated annually by the facility during R&D for PCB disposal activities does not exceed 500 gallons or 70 cubic feet of liquid or non-liquid PCBs and does not exceed a maximum concentration of **10,000 ppm** PCBs.
- (iv) No more than 1 kilogram total of pure PCBs per year is disposed of in all R&D for PCB disposal activities at a facility.
- (v) Each R&D for PCB disposal activity under this section lasts no more than 1 calendar year.
- (vi) Store all PCB wastes (treated and untreated PCB materials, testing samples, spent laboratory samples, residuals, untreated samples, contaminated media or instrumentation, clothing, etc.) in compliance with §761.65(b) and dispose of them according to the undiluted PCB concentration prior to treatment. However, PCB materials not treated in the R&D for PCB disposal activity may be returned either to the physical location where the samples were collected or a location where other regulated PCBs from the physical location where the samples were collected are being stored for disposal.
- (vii) Use manifests pursuant to subpart K of this part for all R&D PCB wastes being transported from the R&D facility to an approved PCB storage or disposal facility. However, §§761.207 through 761.219 do not apply if the residuals or treated samples are returned either to the physical location where the samples were collected or a location where other regulated PCBs from the physical location where the samples were collected are being stored for disposal.
- (viii) Package and ship all PCB wastes pursuant to DOT requirements under 49 CFR parts 171 through 180.
- (ix) Comply with the recordkeeping requirements of §761.180.

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** PCB Concentrations and 10,000 PPM

### 40 CFR §761.79 Decontamination standards and procedures

(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.

(3) Any person decontaminating a non-porous surface in contact with free-flowing mineral oil dielectric fluid (MODEF) at levels **≤10,000 ppm** PCBs must do so as follows:

- (i) Drain the free-flowing MODEF and allow the residual surfaces to drain for an additional 15 hours.
- (ii) Dispose of drained MODEF according to paragraph (g) of this section.
- (iii) Soak the surfaces to be decontaminated in a sufficient amount of clean (containing <2 ppm PCBs) performance-based organic decontamination fluid (PODF) such that there is a minimum of 800 ml of PODF for each 100 cm<sup>2</sup> of contaminated or potentially contaminated surface for at least 15 hours at ≥20 °C.
- (iv) Approved PODFs include:
  - (A) Kerosene.
  - (B) Diesel fuel.
  - (C) Terpene hydrocarbons.
  - (D) Mixtures of terpene hydrocarbons and terpene alcohols.
- (v) Drain the PODF from the surfaces.
- (vi) Dispose of the drained PODF in accordance with paragraph (g) of this section.

## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** PCB Concentrations and 10,000 PPM

### 40 CFR §761.79 Decontamination standards and procedures

(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.

(4) Any person decontaminating a non-porous surface in contact with free-flowing MODEF containing **>10,000 ppm** PCB in MODEF or askarel PCB (up to 70 percent PCB in a mixture of trichlorobenzenes and tetrachlorobenzenes) must do so as follows:

- (i) Drain the free-flowing MODEF or askarel and allow the residual surfaces to drain for an additional 15 hours.
- (ii) Dispose of drained MODEF or askarel according to paragraph (g) of this section.
- (iii) Soak the surfaces to be decontaminated in a sufficient amount of clean PODF (containing <2 ppm PCBs) such that there is a minimum of 800 ml of PODF for each 100 cm<sup>2</sup> of contaminated or potentially contaminated surface for at least 15 hours at  $\geq 20$  °C.
- (iv) Approved PODFs include:
  - (A) Kerosene.
  - (B) Diesel fuel.
  - (C) Terpene hydrocarbons.
  - (D) Mixtures of terpene hydrocarbons and terpene alcohols.
- (v) Drain the PODF from the surfaces.
- (vi) Dispose of the drained PODF in accordance with paragraph (g) of this section.
- (vii) Resoak the surfaces to be decontaminated, pursuant to paragraph (c)(3)(iii) of this section, in a sufficient amount of clean PODF (containing <2 ppm PCBs) such that there is a minimum of 800 ml of PODF for each 100 cm<sup>2</sup> of surface for at least 15 hours at  $\geq 20$  °C.
- (viii) Drain the PODF from the surfaces.
- (ix) Dispose of the drained PODF in accordance with paragraph (g) of this section.

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