

<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
1287. PCB Concentrations and 1,000 PPM	ENCORE	JUL 12, 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 1,000 PPM

DATE: JULY 12, 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 Concentrations and 1,000 PPM

Q: Last week's "Two Minute Training" (2MT) addressed that most customers know the significance of the concentration ≥ 50 ppm PCB waste, i.e., it is PCB regulated, and that there are instances of regulated PCB waste with concentrations at or near 10,000 ppm. So what about the next lower concentration level - are there any instances of regulated PCB wastes with concentrations at or near 1,000 ppm that can be subject to other specific requirements of [40 CFR 761](#)?

A: Yes there are!

[40 CFR 761.30\(a\)\(2\)\(v\)\(A\)](#) and [40 CFR 761.30\(h\)\(2\)\(v\)\(A\)](#) concern removal of free-flowing PCB dielectric fluid from transformers, electromagnets, switches, or voltage regulators. Flushing of the equipment is not required. Either test the fluid or assume it contains $\geq 1,000$ ppm PCBs.

[40 CFR 761.30\(b\)\(1\)](#) concerns the prohibition on the use of railroad transformers that contain dielectric fluids with a PCB concentration of $> 1,000$ ppm. [40 CFR 761.30\(b\)\(2\)\(ii\)](#) states that after January 1, 1984, railroad transformers may only be serviced with dielectric fluid containing $< 1,000$ ppm PCB.

[40 CFR 761.60\(b\)\(3\)\(ii\)](#) concerns PCB hydraulic machines and the removal and disposal of free-flowing liquid. If the PCB liquid contains $\geq 1,000$ ppm PCB, then the hydraulic machine must be decontaminated or flushed prior to disposal with an approved solvent that contains < 50 ppm PCB.

These were the only five citations referencing "1,000 ppm" PCBs in 40 CFR 761.

SUMMARY:

- PCB wastes are generally regulated if the PCB concentration is ≥ 50 ppm.
- PCB wastes can have specific requirements if concentrations are in the 1,000 ppm range.
- There are five citations referencing PCB concentrations at or near 1,000 ppm and all address PCB liquids in terms of removal, disposal, use, servicing or decontamination.

Excerpts from 40 CFR 761.30 and 40 CFR 761.60 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: 7/12/18

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Concentrations and 1,000 PPM

40 CFR §761.30 Authorizations

The following non-totally enclosed PCB activities are authorized pursuant to section 6(e)(2)(B) of TSCA:

(a) *Use in and servicing of transformers (other than railroad transformers).* PCBs at any concentration may be used in transformers (other than in railroad locomotives and self-propelled railroad cars) and may be used for purposes of servicing including rebuilding these transformers for the remainder of their useful lives, subject to the following conditions:

(2) *Servicing conditions.*

(v) You may reclassify a PCB Transformer that has been tested and determined to have a concentration of ≥ 500 ppm PCBs to a PCB-Contaminated transformer (≥ 50 but < 500 ppm) or to a non-PCB transformer (< 50 ppm), and you may reclassify a PCB-Contaminated transformer that has been tested and determined to have a concentration of ≥ 50 ppm but < 500 ppm to a non-PCB transformer, as follows:

(A) Remove the free-flowing PCB dielectric fluid from the transformer. Flushing is not required. Either test the fluid or assume it contains $\geq 1,000$ ppm PCBs. Refill the transformer with fluid containing known PCB levels according to the following table. Determine the transformer's reclassified status according to the following table (if following this process does not result in the reclassified status you desire, you may repeat the process):

(b) *Use in and servicing of railroad transformers.* PCBs may be used in transformers in railroad locomotives or railroad self-propelled cars ("railroad transformers") and may be processed and distributed in commerce for purposes of servicing these transformers in a manner other than a totally enclosed manner subject to the following conditions:

(1) *Use restrictions.* After July 1, 1986, use of railroad transformers that contain dielectric fluids with a PCB concentration $> 1,000$ ppm is prohibited.

(2) *Servicing restrictions.*

(ii) After January 1, 1984, railroad transformers may only be serviced with dielectric fluid containing less than $1,000$ ppm PCB, except as provided in paragraph (b)(2)(i) of this section;

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Concentrations and 1,000 PPM

40 CFR §761.30 Authorizations

(h) *Use in and servicing of electromagnets, switches and voltage regulators.* PCBs at any concentration may be used in electromagnets, switches (including sectionalizers and motor starters), and voltage regulators and may be used for purposes of servicing this equipment (including rebuilding) for the remainder of their useful lives, subject to the following conditions:

(2) *Servicing conditions.*

(v) You may reclassify an electromagnet, switch, or voltage regulator that has been tested and determined to have a concentration of ≥ 500 ppm PCBs to PCB-Contaminated status (≥ 50 but < 500 ppm) or to non-PCB status (< 50 ppm), and you may reclassify a PCB-Contaminated electromagnet, switch, or voltage regulator that has been tested and determined to have a concentration of ≥ 50 ppm but < 500 ppm to a non-PCB status, as follows:

(A) Remove the free-flowing PCB dielectric fluid from the electromagnet, switch, or voltage regulator. Flushing is not required. Either test the fluid or assume it contains $\geq 1,000$ ppm PCBs. Refill the electromagnet, switch, or voltage regulator with fluid containing known PCB levels according to the following table. Determine the electromagnet, switch, or voltage regulator's reclassified status according to the following table (if following this process does not result in the reclassified status you desire, you may repeat the process):

40 CFR §761.60 Disposal requirements

(b) *PCB Articles.* This paragraph does not authorize disposal that is otherwise prohibited in §761.20 or elsewhere in this part.

(3) *PCB hydraulic machines.*

(i) Any person disposing of PCB hydraulic machines containing PCBs at concentrations of ≥ 50 ppm, such as die casting machines shall do so by one of the following methods:

(A) In accordance with §761.79.

(B) In a facility which is permitted, licensed, or registered by a State to manage municipal solid waste subject to part 258 of this chapter or non-municipal non-hazardous waste subject to §§257.5 through 257.30 of this chapter, as applicable (excluding thermal treatment units).

(C) In a scrap metal recovery oven or smelter operating in compliance with §761.72.

(D) In a disposal facility approved under this part.

(ii) All free-flowing liquid must be removed from each machine and the liquid must be disposed of in accordance with the provisions of paragraph (a) of this section. If the PCB liquid contains $\geq 1,000$ ppm PCB, then the hydraulic machine must be decontaminated in accordance with §761.79 or flushed prior to disposal with a solvent listed at paragraph (b)(1)(i)(B) of this section which contains < 50 ppm PCB. The solvent must be disposed of in accordance with paragraph (a) of this section or §761.79.

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