

<u>SUBJECT</u>		<u>DATE</u>
1056. Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	APR 23, 2015
1057. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	APR 30, 2015
1058. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAY 7, 2015
1059. Decharacterized Wastes, <90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAY 14, 2015
1060. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAY 21, 2015
1061. Hazardous Debris Macroencapsulation and Size Reduction	ENCORE	MAY 28, 2015
1062. Universal Waste Lamps and Prohibition on Crushing		JUN 4, 2015
1063. F003 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 11, 2015
1064. F001 - F005 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 18, 2015
1065. Macroencapsulation of Hazardous Debris and Presence of Free Liquids	ENCORE	JUN 25, 2015
1066. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries		JUL 1, 2015
1067. Used Oil Eligibility for Animal and Vegetable Oils	ENCORE	JUL 9, 2015
1068. Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils		JUL 16, 2015
1069. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 23, 2015
1070. Conditioned Exclusion for Characteristic Debris Treated via Immobilization		JUL 30, 2015
1071. RCRA Personnel Training and Classroom Training vs. Online Training		AUG 6, 2015
1072. PCB Decontamination Standards with No Decontamination Performed		AUG 13, 2015
1073. PCB Manifest Exceptions a.k.a., When is a PCB Manifest Not Required	ENCORE	AUG 19, 2015

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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 MANIFEST EXCEPTIONS A.K.A., WHEN IS A PCB MANIFEST NOT REQUIRED?

**DATE:** AUGUST 19, 2015

<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 Ty Blackford Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Roni Swan Michael Waters Jeff Widney	Brett Barnes Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Jennie Seaver Ray Swenson Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Christina Robison Don Rokkan Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson Jean Quigley	Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Kyle Webster Jeff Westcott Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** PCB Manifest Exceptions a.k.a., When is a PCB Manifest Not Required?

**Q:** When is a PCB manifest not required to be offered to a transporter?

**A:** Per 40 CFR 761.211, "Manifest system-Transporter requirements", it basically states:

A transporter shall not accept PCB waste from a generator unless it is accompanied by a manifest signed by the generator, except that a manifest is not required if:

1. The shipment of PCB waste consists solely of PCB wastes with PCB concentrations below 50 ppm, unless the PCB concentration below 50 ppm was the result of dilution, in which case the PCB waste must be managed as if it contained the original concentration prior to dilution, or;
2. The PCB waste is accepted by the transporter for transport only to a storage or disposal facility owned or operated by the generator of the PCB waste.

If the PCB waste is less than 50 ppm, and not the result of dilution, it is not subject to TSCA and therefore a PCB manifest is not required. If the PCB waste is being transported to a storage or disposal facility owned by the generator, the generator is retaining control of the PCB waste and therefore a PCB manifest is also not required.

The above interpretation on generator's transporting to their own storage or disposal facilities was confirmed in the December 21, 1989, Federal Register on page 52728, which states:

*"A manifest need not accompany the shipment via transport vehicle of PCB wastes to a storage or disposal facility owned or operated by the end user of PCBs and PCB Items, because these generators have not yet relinquished control over the PCB waste."*

Furthermore, the EPA - TSCA "PCB Questions and Answers Manual" states on page XIX-5:

**Q6:** If a generator owns two storage facilities which have different EPA identification numbers and ships PCB waste from one facility to another for purposes of consolidation, must the waste be manifested?

**A6:** No. The PCB waste has not left the generator's control and, therefore, need not be manifested at this time."

### **SUMMARY:**

- A PCB manifest is required for PCB waste regulated by TSCA.
- If PCB waste is <50 ppm and not due to dilution, a PCB Manifest is not required.
- If the PCB waste is being transported from a generator's site to a storage or disposal facility owned by the generator, a PCB Manifest is also not required.

Nothing is attached to the e-mail. If you have any questions, contact me at "Paul\_W\_Martin@rl.gov" or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:**

**FILE:** c:\...\2MT\2015\15.rtf

**PG:** 1

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