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1320.	Treated Hazardous Waste Used as Dust Suppressant	FEB 28, 2019
1321.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE MAR 7, 2019
1322.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE MAR 14, 2019
1323.	Decharacterized Wastes, ≤90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE MAR 21, 2019
1324.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE MAR 28, 2019
1325.	PCB Decontamination Standard with No Decontamination Performed	ENCORE APR 4, 2019
1326.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required?	ENCORE APR 11, 2019
1327.	PCB Manifest Relief a.k.a., When is a PCB Manifest Not Required? – The Sequel	ENCORE APR 18, 2019
1328.	PCB Concentrations and Micrograms per Centimeters Squared (µg/cm ²)	ENCORE APR 25, 2019
1329.	Operating Record vs. Operating Log	ENCORE MAY 2, 2019
1330.	Operating Records Not Referenced in the “Operating Record” Regulations	ENCORE MAY 9, 2019
1331.	Washington State Used Oil and Mixtures with Other Materials	ENCORE MAY 16, 2019
1332.	Used Oil Filter Regulation – The Feds vs. Washington State	ENCORE MAY 23, 2019
1333.	Printed Circuit Board Recycling – Shredded vs. Whole	ENCORE MAY 30, 2019
1334.	Universal Waste Alkaline Batteries and Self-Transportation	ENCORE JUN 6, 2019
1335.	Universal Waste Lithium Batteries and Self-Transportation	ENCORE JUN 13, 2019
1336.	RCRA Hazard Labeling – A Random Scenario	ENCORE JUN 20, 2019
1337.	Regulatory Status of Chromated, Copper, Arsenate, (CCA) Wood as Wood Mulch	ENCORE JUN 27, 2019
1338.	Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE JUL 3, 2019
1339.	The Hazardous Waste Characteristic of Reactivity (D003)	ENCORE JUL 11, 2019
1340.	Central Accumulation Areas and Signage Requirements	ENCORE 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 21, 2019

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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 CONTAINERS AND ≥ 50 PPM

DATE: AUGUST 22, 2019

<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 Bill Cox Jeanne Elkins Ryan Fischer Jonathan Fullmer Ted Hopkins Barry Lawrence Jim Leary Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Linda Petersen Fred Ruck Sean Sexton Dave Shea Ray Swenson 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 Skogle 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: PCB Containers and ≥ 50 ppm

Q: 40 CFR 761.3 specifically defines a "PCB Transformer" as a transformer containing 500 ppm or greater PCBs. "PCB-Contaminated" is defined as a material containing between 50 ppm and less than 500 ppm PCBs. The definition of a "PCB Container" does not specify a PCB concentration level. Is there a specified PCB concentration associated with a PCB container?

A: According to a TSCA EPA, Question and Answer, EPA stated:

"The term 'PCB Container' as found under the marking, storage, disposal, and recordkeeping sections of the TSCA regulations, specifically applies to drums, bulk tanks, and other containers (defined under 761.3) containing PCBs in concentrations of 50 ppm or greater. This 50 ppm regulatory level applies to 'PCB Article Containers' as well."

This means that if a generator has a container of PCB remediation waste with < 50 ppm PCBs, the container is not considered a "PCB Container" and also that certain marking, storage, disposal and recordkeeping requirements would not apply. Note that < 50 ppm PCB remediation waste itself has specific disposal requirements, but if the waste is removed from the container, there are no disposal or decontamination requirements for the container that contained < 50 ppm PCB waste. Also note that if the < 50 ppm is the result of dilution, per 40 CFR 761.1(b)(5) all applicable requirements apply as if the waste were at its original concentration.

SUMMARY:

- "PCB Transformers" contain ≥ 500 ppm PCBs; "PCB-Contaminated" material contains ≥ 50 ppm and < 500 ppm PCBs.
- A "PCB Container" contains ≥ 50 ppm PCBs.
- A container with < 50 ppm PCB waste is not a "PCB Container".

Excerpts from the EPA TSCA Q&A and excerpts from 40 CFR 761.1 and 761.3 are attached to the e-mail. If you have any questions, contact me at [Paul W. Martin@rl.gov](mailto:Paul.W.Martin@rl.gov) or at (509) 376-6620.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Containers and ≥ 50 ppm

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

PCB Q&A Manual 1994 Edition

Page XII-9

Q10: The regulations define a PCB Transformer as containing 500 ppm or greater PCBs. However, there is no specific PCB level mentioned under the definition of a "PCB Container." Has EPA established a regulatory PCB level for PCB Containers in relation to marking/labeling, storage, and recordkeeping?

A10: Yes. The term "PCB Container" as found under the marking, storage, disposal, and recordkeeping sections of the TSCA regulations, specifically applies to drums, bulk tanks, and other containers (defined under 761.3) containing PCBs in concentrations of 50 ppm or greater. This 50 ppm regulatory level applies to "PCB Article Containers" as well.

Prior to disposal, an undrained PCB Container with PCB concentrations at 50 ppm or greater shall be stored in a PCB storage facility. Unless decontaminated, a PCB Container containing PCBs in concentrations of 50 ppm or greater shall be disposed of in accordance with 761.60(c). For a PCB Container to be decontaminated, it must be flushed three times with a solvent containing less than 50 ppm PCBs. The solubility of PCBs in the solvent must be 5 percent or more by weight. Each rinse shall use a volume of normal diluent equal to approximately 10 percent of the PCB Container capacity. The solvent may be reused for decontamination until it contains 50 ppm PCB [761.79(a)]. The solvent shall then be disposed of as liquid PCBs in accordance with 761.60(a). Nonliquid PCBs resulting from decontamination procedures shall also be disposed of in accordance with 761.60(a)(4).

40 CFR 761.1 **Applicability**

(b)(5) No person may avoid any provision specifying a PCB concentration by diluting the PCBs, unless otherwise specifically provided.

40 CFR 761.3 **Definitions.**

PCB Transformer means any transformer that contains ≥ 500 ppm PCBs. For PCB concentration assumptions applicable to transformers containing 1.36 kilograms (3 lbs.) or more of fluid other than mineral oil, see §761.2. For provisions permitting reclassification of electrical equipment, including PCB Transformers, containing ≥ 500 ppm PCBs to PCB-Contaminated Electrical Equipment, see §761.30(a) and (h).

PCB-Contaminated means a non-liquid material containing PCBs at concentrations ≥ 50 ppm but < 500 ppm; a liquid material containing PCBs at concentrations ≥ 50 ppm but < 500 ppm or where insufficient liquid material is available for analysis, a non-porous surface having a surface concentration $> 10 \mu\text{g}/100 \text{ cm}^2$ but $< 100 \mu\text{g}/100 \text{ cm}^2$, measured by a standard wipe test as defined in §761.123.

PCB Container means any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.

FROM: Paul W. Martin

DATE: 8/22/19

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