

<u>SUBJECT</u>		<u>DATE</u>
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 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

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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 CONCENTRATION ASSUMPTIONS FOR USE VS. PCB DISPOSAL

DATE: SEPTEMBER 5, 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 Concentration Assumptions for Use vs. PCB Disposal

Q: A customer has several small transformers containing <3 pounds of fluid. The customer has been using the PCB concentration assumptions for use at 40 CFR 761.2(a)(1) which basically allow any person to assume that transformers with < 3 pounds of unestablished fluid have a PCB concentration of < 50 ppm. The customer now wants to dispose of the transformers that have been assumed to be <50 ppm PCBs. Can the customer continue to assume the transformers are <50 ppm PCBs and dispose as PCB nonregulated wastes?

A: Per TSCA EPA's January 2014 PCB Question and Answer Manual on page 6, it states:

“Q: *Do the PCB concentration assumptions in §761.2 apply to use, storage and disposal, or only use?*

A: *The assumptions apply to use and to storage for reuse. They do not apply to disposal or to storage for disposal. For example, if you are the owner of a transformer manufactured before July 2, 1979, that contains ≥3 pounds of fluid other than mineral oil at an unknown concentration, while the transformer is in use you must assume it is a PCB Transformer, i.e., that it contains ≥500 ppm PCBs. Once you decide to dispose of the transformer, you are no longer required to assume that it is a PCB Transformer. You must know the concentration at the time of disposal in order to assure compliance with the regulations. However, if you place the transformer into storage for disposal without having determined its concentration, EPA recommends that you store it as if it contains PCBs at regulated levels to avoid a violation.”*

The example given by EPA (≥3 pounds of fluid) does not apply to the customer's situation; however, the main points of EPA's answer do apply. The assumptions for use apply to use and to storage for reuse; and you must know the concentration of PCBs at the time of disposal to comply with 40 CFR 761.

Therefore, our customer cannot assume their transformers with <3 lbs of fluid are <50 ppm PCBs at the time of disposal and per 40 CFR 761.2(c) the customer must test the fluid or use manufacturer's information and service records to document the concentration PCBs.

SUMMARY:

- The PCB concentration assumptions for use at 40 CFR 761.2 apply to use and to storage for reuse.
- Once a PCB item is removed from service for disposal, the PCB concentration assumptions for use do not apply and the PCB concentrations must be known at the time of disposal.
- PCB items destined for disposal must have their PCB concentrations established per 40 CFR 761.2(c) by testing, or by manufacturer's information and service records.

40 CFR 761.2 and excerpts from the January 2014 PCB Q&A Manual 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.

FROM: Paul W. Martin

DATE: 9/5/19

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Concentration Assumptions for Use vs. PCB Disposal

§761.2 PCB concentration assumptions for use

(a)

- (1) Any person may assume that transformers with < 3 pounds (1.36 kilograms (kgs)) of fluid, circuit breakers, reclosers, oil-filled cable, and rectifiers whose PCB concentration is not established contain PCBs at < 50 ppm.
- (2) Any person must assume that mineral oil-filled electrical equipment that was manufactured before July 2, 1979, and whose PCB concentration is not established is PCB-Contaminated Electrical Equipment (i.e., contains ≥ 50 ppm PCB, but < 500 ppm PCB). All pole-top and pad-mounted distribution transformers manufactured before July 2, 1979, must be assumed to be mineral-oil filled. Any person may assume that electrical equipment manufactured after July 2, 1979, is non-PCB (i.e., < 50 ppm PCBs). If the date of manufacture of mineral oil-filled electrical equipment is unknown, any person must assume it to be PCB-Contaminated.
- (3) Any person must assume that a transformer manufactured prior to July 2, 1979, that contains 1.36 kg (3 pounds) or more of fluid other than mineral oil and whose PCB concentration is not established, is a PCB Transformer (i.e., ≥ 500 ppm). If the date of manufacture and the type of dielectric fluid are unknown, any person must assume the transformer to be a PCB Transformer.
- (4) Any person must assume that a capacitor manufactured prior to July 2, 1979, whose PCB concentration is not established contains ≥ 500 ppm PCBs. Any person may assume that a capacitor manufactured after July 2, 1979, is non-PCB (i.e., < 50 ppm PCBs). If the date of manufacture is unknown, any person must assume the capacitor contains ≥ 500 ppm PCBs. Any person may assume that a capacitor marked at the time of manufacture with the statement “No PCBs” in accordance with §761.40(g) is non-PCB.

(b) PCB concentration may be established by:

- (1) Testing the equipment; or
- (2)
 - (i) A permanent label, mark, or other documentation from the manufacturer of the equipment indicating its PCB concentration at the time of manufacture; and
 - (ii) Service records or other documentation indicating the PCB concentration of all fluids used in servicing the equipment since it was first manufactured.

[63 FR 35436, June 29, 1998, as amended at 64 FR 33759, June 24, 1999]

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Concentration Assumptions for Use vs. PCB Disposal

January 2014 Version
Revisions to the PCB Q and A Manual

§761.2 Assumptions

General

1. **Q:** *Do the PCB concentration assumptions in §761.2 apply to use, storage and disposal, or only use?*

A: The assumptions apply to use and to storage for reuse. They do not apply to disposal or to storage for disposal. For example, if you are the owner of a transformer manufactured before July 2, 1979, that contains <3 pounds of fluid other than mineral oil at an unknown concentration, while the transformer is in use you must assume it is a PCB Transformer, i.e., that it contains <500 ppm PCBs. Once you decide to dispose of the transformer, you are no longer required to assume that it is a PCB Transformer. You must know the concentration at the time of disposal in order to assure compliance with the regulations. However, if you place the transformer into storage for disposal without having determined its concentration, EPA recommends that you store it as if it contains PCBs at regulated levels to avoid a violation.

2. **Q:** *Can I dispose of equipment manufactured after July 2, 1979, without testing to determine if it is non-PCB?*

A: No. The PCB concentration assumptions in §761.2 apply only while the equipment is in use. At the time of disposal, you must know the equipment's actual PCB concentration.

3. **Q:** *If PCBs are not used in an authorized manner and are released, can the assumptions in these sections still be made?*

A: No, for two reasons. First, the assumptions apply only to authorized uses. Second, the assumptions only apply while the equipment is in use or stored for reuse. They do not apply to PCBs that have spilled or been otherwise released from the equipment.

4. **Q:** *Can I clean up a spill from a transformer manufactured after 1979 assuming the PCB concentration of the spill is <50 ppm? Similarly, can I clean up a spill from a transformer containing less than 3 pounds of PCBs assuming the concentration is <50 ppm?*

A: No. The PCB concentration assumptions in §761.2 apply only while the equipment is in use or stored for reuse. At the time of disposal, you must know the equipment's actual PCB concentration. The concentration assumptions do not apply to PCBs that have spilled or been otherwise released from the equipment.