

<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		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		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
1348. RCRA LR One-Year Storage Prohibition vs., PCB One-Year Disposal Time Limit		SEP 12, 2019
1349. Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978	ENCORE	SEP 19, 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: REGULATORY STATUS OF PCB REMEDIATION WASTES DISPOSED PRIOR TO APRIL 18, 1978

DATE: SEPTEMBER 19, 2019

CHPRC Projects	CH PRC - Env. Protection	MSA	Hanford Laboratories	Other Hanford Contractors	Other Hanford Contractors
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) DOE RL, ORP, WIPP 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: Regulatory Status of PCB Remediation Wastes

Q: PCB contaminated soil is discovered on a customer's site with PCB concentrations ≥ 50 ppm. The customer knows that several spills occurred in 1975 but does not know the original PCB concentrations or sources of the spills. The customer wants to remediate the area but is unsure if the PCB contaminated soil meets the definition of "PCB remediation waste". What is the definition of PCB remediation waste and does our customer's PCB contaminated soil meet that definition?

A: Per [40 CFR 761.3](#), "PCB remediation waste" is basically defined as waste containing PCBs as a result of a spill, release, or other unauthorized disposal and can include soil, rags, and other debris generated as a result of any PCB spill cleanup. Since the customer has soil contaminated with PCBs from spills, it basically meets the definition of PCB remediation waste.

However, the definition goes on to state various dates and concentrations of the original spills that must be considered in determining if a material is PCB remediation waste. The definition states that a material is PCB remediation waste if:

- Disposed of prior to April 18, 1978, and currently ≥ 50 ppm PCBs, regardless of the concentration of the original spill; or
- Currently at any volume or concentration where the original source was ≥ 500 ppm PCBs beginning on April 18, 1978, or ≥ 50 ppm PCBs beginning on July 2, 1979; or
- Currently at any concentration, if the PCBs are spilled or released from a source not authorized for use under this part.

Since our customer's PCB waste was disposed prior to April 18, 1978, and is currently ≥ 50 ppm PCBs, the PCB contaminated soil meets the definition of PCB remediation waste. Note that this is regardless of the concentration of the original spill.

SUMMARY:

- PCB remediation wastes:
 - ◆ Are materials containing PCBs as a result of spills, releases, or unauthorized disposal;
 - ◆ Can be soil, rags and other debris generated as a result of any PCB spill cleanups;
 - ◆ Are defined per the date of disposal and the concentration of the original spill.

An excerpt from 40 CFR 761.3, concerning the definition of PCB remediation waste is attached to the e-mail. If you have any questions, contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Regulatory Status of PCB Remediation Wastes Disposed Prior to April 18, 1978

40 CFR 761.3 Definitions.

PCB remediation waste means waste containing PCBs as a result of a spill, release, or other unauthorized disposal, at the following concentrations:

- Materials disposed of prior to April 18, 1978, that are currently at concentrations ≥ 50 ppm PCBs, regardless of the concentration of the original spill;
- Materials which are currently at any volume or concentration where the original source was ≥ 500 ppm PCBs beginning on April 18, 1978, or ≥ 50 ppm PCBs beginning on July 2, 1979; and
- Materials which are currently at any concentration if the PCBs are spilled or released from a source not authorized for use under this part.

PCB remediation waste means soil, rags, and other debris generated as a result of any PCB spill cleanup, including, but not limited to:

- (1) Environmental media containing PCBs, such as soil and gravel; dredged materials, such as sediments, settled sediment fines, and aqueous decantate from sediment.
- (2) Sewage sludge containing < 50 ppm PCBs and not in use according to §761.20(a)(4); PCB sewage sludge; commercial or industrial sludge contaminated as the result of a spill of PCBs including sludges located in or removed from any pollution control device; aqueous decantate from an industrial sludge.
- (3) Buildings and other man-made structures (such as concrete floors, wood floors, or walls contaminated from a leaking PCB or PCB-Contaminated Transformer), porous surfaces, and non-porous surfaces.