	SUBJECT		DATE
1056.	PCB Reporting and Recordkeeping Relief	ENCORE	JAN 12, 2014
1057.	Commercial Chemical Products and Unused Batteries	ENCORE	JAN 16, 2014
1058.	PCB Annual Records Retention Timeframes		JAN 31, 2014
1059.	Satellite Accumulation within a ≤90-day Accumulation Area		FEB 7, 2014
1060.	PCB Certificate of Disposal Relief	ENCORE	FEB 13, 2014
1061.	Used Oil and Weekly Inspections		FEB 20, 2014
1062.	Bags and RCRA Container Definition		FEB 27, 2014
1063.	Product Storage Tank Residues and Hazardous Waste Regulations	ENCORE	MAR 6, 2014
1064.	Spent Lead-Acid Batteries and Accumulation Time Limits		MAR 13, 2014
1065.	Land Disposal Restrictions and Dates of Accumulation		MAR 23, 2014
1066.	Universal Waste Accumulation Time Limits and the One Year Rule		MAR 29, 2014
1067.	PCB Manifest Discrepancy Reports and Estimated Waste Weights		APR 6, 2014
1068.	PCB Wastes, Independent Transporters and Confirmation of Receipt		APR 10, 2014
1069.	Paint Wastes and The Applicability of the F001-F005 Listings to Ingredients	ENCORE	APR 20, 2014
1070.	Other Paint Wastes and the Applicability of the F001-F005 Listings	ENCORE	APR 24, 2014
1071.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents		MAY 1, 2014
1072.	TSCA "No PCBs" versus "Non-PCBs" versus "Nondetectable PCBs"	ENCORE	MAY 8, 2014
1073.	Purpose of Keeping a Hazardous Waste Container Closed	ENCORE	MAY 15, 2014
1074.	PCB Containers and Multiple Removed From Service Dates		MAY 22, 2014
1075.	Satellite Accumulation and RCRA Personnel Training		MAY 29, 2014
1076.	Transporter Signatures on Hazardous Waste Manifest and Multiple Drivers		JUN 5, 2014
1077.	Universal Waste and Nonhazardous Batteries		JUN 12, 2014
1078.	Universal Waste and Incandescent Bulbs		JUN 19, 2014
1079.	The PCB Mark and the Fields “Also Contact” and “Tel No”	ENCORE	JUN 29, 2014
1080.	Halon Fire Extinguishers - Banned or Not Banned?	ENCORE	JUL 5, 2014
1081.	Cabinets as RCRA Containers	ENCORE	JUL 13, 2014
1082.	LDR Storage Prohibitions and Treated Wastes	ENCORE	JUL 17, 2014
1083.	LDR Treatment Standards and F001 “Chlorinated Fluorocarbons”	ENCORE	JUL 24, 2014
1084.	RCRA Regulatory Status of Chlorinated Fluorocarbons Used as Refrigerants	ENCORE	JUL 31, 2014
1085.	Universal Wastes, Manifesting and DOT Shipping Names		AUG 7, 2014
1086.	CERCLA Hazardous Substances – A Brief Definition		AUG 14, 2014
1087.	CERCLA Hazardous Substances – The Petroleum Exclusion		AUG 21, 2014
1088.	PCB Concentration Assumptions for Use vs. PCB Disposal	ENCORE	AUG 28, 2014
1089.	Universal Waste and Basis for the One Year Accumulation Time Limit		SEP 4, 2014
1090.	Product Spills and Waste Determinations	ENCORE	SEP 11, 2014
1091.	PCB Concentrations and 10,000 PPM		SEP 18, 2014
1092.	PCB Concentrations and 1,000 PPM		SEP 25, 2014

TWO MINUTE TRAINING

TO: *CH2M HILL PLATEAU REMEDIATION COMPANY*

FROM: *PAUL W. MARTIN, Senior Environmental Compliance Officer*
CHPRC Environmental Protection, Hanford, WA

SUBJECT: *PCB CONCENTRATIONS AND 1,000 PPM*

DATE: *SEPTEMBER 25, 2014*

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

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 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 ≥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 ≥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 to the e-mail. If you have any questions, please contact me at "Paul_W_Martin@rl.gov" or at (509) 376-6620.

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 **≥1,000 ppm** PCBs. Retrofill 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 **≥1,000 ppm** PCBs. Retrofill 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 **≥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.