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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: FLUORESCENT LIGHT BALLASTS AND PCB ANNUAL REPORTING

DATE: NOVEMBER 14, 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 Skoglie 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: Fluorescent Light Ballasts and PCB Annual Reporting

Q: In last week's Two Minute Training (2MT), the customer disposed of PCB ballasts with ≥ 50 ppm PCBs in the potting material as PCB Bulk Product Wastes. The customer knows that certain PCB Bulk Product Wastes such as plastic vehicle parts, applied dried paints, non-liquid building demolition debris, etc., are not subject to the PCB annual report referenced in [40 CFR 761, Subpart J](#). Since fluorescent ballasts containing ≥ 50 ppm PCBs in the potting material can be regulated as PCB Bulk Product Wastes, does this mean that these types of ballasts do not have to be reported?

A: Maybe.

A review of [40 CFR 761.62\(b\)\(1\)](#) confirms no references to "fluorescent" or "ballasts". However, 761.62(b)(1) allows for other PCB Bulk Product Waste to be disposed under paragraph (b) but only if the other waste, such as these PCB ballasts, meets the leachate test under 761.62(b)(1)(i).

Also, 40 CFR 761.62(b)(2) allows for the disposal of PCB Bulk Product Waste other than those materials meeting paragraph (b)(1) if the material, such as these PCB ballasts, are segregated from organic liquid disposed in a municipal landfill, and the landfill leachate is collected and monitored for PCBs. If the conditions in (b)(1) or (b)(2) are met, these PCB ballasts can be managed under 40 CFR 761.62(b). Then under 761.62(b)(6), subparts [C, "Marking or PCBs and PCB Items"; J, "General Records and Reports";](#) and [K, "PCB Waste Disposal Records and Records";](#) do not apply. Subpart J is specific to the annual document log and annual records that contribute to PCB annual report.

Therefore, if the customer's PCB ballast are sampled and meet the leach test (< 10 $\mu\text{g/L}$ of water), or if the customer's PCB ballasts are disposed in a municipal landfill that segregates the PCB ballasts from organic liquids, and the landfill leachate is collected and monitored - then these PCB ballasts are not subject the PCB annual report of 40 CFR 761, Subpart J.

SUMMARY:

- PCB Bulk Product Wastes disposed under 40 CFR 761.62(b) are not subject to PCB marking, manifesting or annual reports.
- Specified PCB Bulk Product Wastes in (b)(1)(i), e.g., applied dried paints, are not subject to PCB annual reports, etc.
- Other PCB Bulk Product Wastes in (b)(1)(ii) and (b)(2) may not be subject to PCB annual reports if a leach test is passed or if the landfill segregates PCB wastes from organic liquids, and collects and monitors its leachate.

An excerpt from 40 CFR 761.62(b) is attached to the e-mail. If you have any questions, please contact me at [Paul W Martin@rl.gov](mailto:Paul_W_Martin@rl.gov) or at (509) 376-6620.

FROM: Paul W. Martin

DATE: 11/14/19

FILE: 2MT\2019\111419.rtf

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Fluorescent Light Ballasts and PCB Annual Reporting

40 CFR 761.62 Disposal of PCB bulk product waste

(b) Disposal in solid waste landfills.

(1) Any person may dispose of the following PCB bulk product waste in a facility permitted, licensed, or registered by a State as a municipal or non-municipal non-hazardous waste landfill:

(i) Plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; applied dried paints, varnishes, waxes or other similar coatings or sealants; caulking; Galbestos; non-liquid building demolition debris; or non-liquid PCB bulk product waste from the shredding of automobiles or household appliances from which PCB small capacitors have been removed (shredder fluff).

(ii) Other PCB bulk product waste, sampled in accordance with the protocols set out in subpart R of this part, that leaches PCBs at <10 µg/L of water measured using a procedure used to simulate leachate generation.

(2) Any person may dispose of PCB bulk product waste other than those materials meeting the conditions of paragraph (b)(1) of this section, (e.g., paper or felt gaskets contaminated by liquid PCBs in a facility that 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, if:

(i) The PCB bulk product waste is segregated from organic liquids disposed of in the landfill unit.

(ii) Leachate is collected from the landfill unit and monitored for PCBs.

(3) Any release of PCBs (including but not limited to leachate) from the landfill unit shall be cleaned up in accordance with §761.61.

(4)

(i) Any person disposing off-site of PCB bulk product waste regulated under paragraph (b)(1) of this section at a waste management facility not having a commercial PCB storage or disposal approval must provide written notice to the facility a minimum of 15 days in advance of the first shipment from the same disposal waste stream. The notice shall state that the PCB bulk product waste may include components containing PCBs at ≥50 ppm based on analysis of the waste in the shipment or application of a general knowledge of the waste stream (or similar material) which is known to contain PCBs at those levels, and that the PCB bulk product waste is known or presumed to leach <10 µg/L PCBs.

(ii) Any person disposing off-site of PCB bulk product waste regulated under paragraph (b)(2) of this section at a waste management facility not having a commercial PCB storage or disposal approval must provide written notice to the facility a minimum of 15 days in advance of the first shipment from the same disposal waste stream and with each shipment thereafter. The notice shall state that the PCB bulk product waste may include components containing PCBs at ≥50 ppm based on analysis of the waste in the shipment or application of a general knowledge of the waste stream (or similar material) which is known to contain PCBs at those levels, and that the PCB bulk product waste is known or presumed to leach ≥10 µg/L PCBs.

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: Fluorescent Light Ballasts and PCB Annual Reporting

(5) Any person disposing of PCB bulk product waste must maintain a written record of all sampling and analysis of PCBs or notifications made under this paragraph for 3 years from the date of the waste's generation. The records must be made available to EPA upon request.

(6) Requirements in subparts C, J, and K of this part do not apply to waste disposed of under paragraph (b) of this section.

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