

<u>SUBJECT</u>		<u>DATE</u>
1188. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	AUG 11, 2016
1189. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario III	ENCORE	AUG 18, 2016
1190. Product Spills and Waste Determinations	ENCORE	AUG 25, 2016
1191. Product Spills, Waste Determinations, and LDR	ENCORE	SEP 1, 2016
1192. Regulatory Status of Caustic Rinse Waters Contaminated with Trace Solvents	ENCORE	SEP 8, 2016
1193. Regulatory Status of Sand Blast Grit Contaminated with Trace Listed Solvents	ENCORE	SEP 15, 2016
1194. Hazardous Waste "F" Listings and Trace Contamination	ENCORE	SEP 22, 2016
1195. Hazardous Waste "F" Listings and Trace Contamination – Again!	ENCORE	SEP 29, 2016
1196. Hazardous Waste Determinations and Phase Separation		OCT 6, 2016
1197. Asbestos and DOT Relief	ENCORE	OCT 13, 2016
1198. PCB Containers and Concentration of PCBs	ENCORE	OCT 20, 2016
1199. PCB Analytical Waste Disposal Requirements	ENCORE	OCT 27, 2016
1200. PCB Analytical Waste Disposal Requirements – Water vs. Organic Liquids and Non-aqueous Inorganic Liquids		NOV 3, 2016
1201. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	NOV 10, 2016
1202. Purpose of the <90-day Hazardous Waste Accumulation Exemption		NOV 17, 2016
1203. Used Oil Eligibility for Turkey and Ham Oils	ENCORE	NOV 23, 2016
1204. PCB Reporting and Recordkeeping Relief	ENCORE	DEC 1, 2016

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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 REPORTING AND RECORDKEEPING RELIEF

DATE: DECEMBER 1, 2016

<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>
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TWO MINUTE TRAINING

SUBJECT: PCB Reporting and Recordkeeping Relief

Q: Subpart J of 40 CFR 761 contains reporting and recordkeeping requirements that apply to PCBs, PCB Items, and to PCB storage and PCB disposal facilities, subject to the TSCA requirements. Basically this means that if something is regulated by TSCA for PCBs, then the PCB annual document log and the PCB annual records of Subpart J apply. Do the TSCA regulations provide any relief from the requirements of Subpart J concerning PCB annual reporting and PCB recordkeeping?

A: Yes, there is relief! Specifically there are seven references to regulatory relief from the reporting and recordkeeping requirements of Subpart J. These include:

- ❑ PCB-Contaminated Articles (≥ 50 ppm to < 500 ppm) with no free-flowing liquids;
- ❑ Non-liquid Bulk PCB remediation wastes with PCB concentrations < 50 ppm;
- ❑ Non-liquid PCB remediation cleanup wastes at any PCB concentration destined for disposal;
- ❑ PCB Bulk Product waste that is eligible for disposal in a solid waste landfill;
- ❑ Non-liquid PCB analytical wastes at any PCB concentration and destined for disposal;
- ❑ Non-liquid cleaning materials and personal protective equipment resulting from decontamination, and;
- ❑ Cleanup equipment used in the double wash/rinse method for decontaminating non-porous surfaces.

Note that all PCB wastes associated with the relief from Subpart J are non-liquids and generally eligible for disposal in a municipal solid waste landfill. Also note that unless the TSCA regulations specifically provide relief from Subpart J, no relief from reporting and recordkeeping is provided. A customer may have a PCB remediation waste with a PCB concentration of < 50 ppm that is subject to minimal TSCA disposal requirements and not subject to any TSCA storage or marking requirements. Nevertheless, reporting and recordkeeping would apply unless specific relief is provided by the TSCA regulations.

SUMMARY:

- Most PCB regulated materials are subject to the reporting and recordkeeping requirements outlined in Subpart J of 40 CFR 761.
- However, some relief is provided via specific wording in the TSCA regulations.
- Relief includes drained PCB Contaminated Articles; non-liquid bulk PCB remediation < 50 ppm, non-liquid cleanup wastes from PCB remediation wastes; PCB Bulk Product waste eligible for solid waste landfill disposal; non-liquid PCB analytical wastes; non-liquid cleaning materials and PPE from decontamination; and cleanup equipment from the double washing/rinsing of non-porous surfaces.

Excerpts from 40 CFR 761 concerning relief from Subpart J are 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: 12/1/16

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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Reporting and Recordkeeping Relief

Subpart J—General Records and Reports

40 CFR 761.180 Records and monitoring.

This section contains recordkeeping and reporting requirements that apply to PCBs, PCB Items, and PCB storage and disposal facilities that are subject to the requirements of the part.

40 CFR 761.60(b)(6) Other PCB Articles.

(ii)(C) Requirements in subparts J and K of this part do not apply to PCB-Contaminated Articles from which all free-flowing liquids have been removed.

40 CFR 761.61(a)(5) PCB Remediation Waste

(i)(B)(2)(ii) Bulk PCB remediation wastes with a PCB concentration of <50 ppm shall be disposed of in accordance with paragraph (a)(5)(v)(A) of this section.

(v) Cleanup wastes. Any person generating the following wastes during and from the cleanup of PCB remediation waste shall dispose of or reuse them using one of the following methods:

(A) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from cleanup activities shall be either decontaminated in accordance with §761.79(b) or (c), or disposed of in one of the following facilities, without regard to the requirements of subparts J and K of this part:

40 CFR 761.62 Disposal of PCB bulk product waste.

(b) Disposal in solid waste landfills.

(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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TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Reporting and Recordkeeping Relief

40 CFR 761.64 Disposal of wastes generated as a result of research and development activities authorized under §761.30(j) and chemical analysis of PCBs.

(b)(2) Non-liquid wastes must be disposed of in the same manner as non-liquid cleaning materials and personal protective equipment waste according to §761.61(a)(5)(v)(A).

40 CFR 761.79 Decontamination standards and procedures.

(g)(6) Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from decontamination shall be disposed of in accordance with §761.61(a)(5)(v).

40 CFR 761.378 Decontamination, reuse, and disposal of solvents, cleaners, and equipment.

(c) Disposal. Dispose of all solvents, cleaners, and absorbent materials in accordance with §761.79(g). Dispose of equipment in accordance with §761.61(a)(5)(v)(A), or decontaminate in accordance with §761.79(b) or (c). Store for disposal equipment, solvents, cleaners, and absorbent materials in accordance with §761.65.

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