

<u>SUBJECT</u>		<u>DATE</u>
1394. RCRA Empty vs. DOT Empty	ENCORE	JUL 30, 2020
1395. RCRA Empty vs. DOT Empty II	ENCORE	AUG 6, 2020
1396. Empty Containers and the "Empty" Label	ENCORE	AUG 13, 2020
1397. Exceptions to Free Liquids in Landfills Prohibition	ENCORE	AUG 20, 2020
1398. Dust Suppression in Landfills with Nonhazardous Liquids	ENCORE	AUG 27, 2020
1399. Treated Hazardous Wastes Used as Dust Suppressant	ENCORE	SEP 3, 2020
1400. Regulatory Status of Used Oil Mixed with Diesel Fuel	ENCORE	SEP 10, 2020
1401. RCRA Liquids, Free Liquids, and Releasable Liquids	ENCORE	SEP 17, 2020
1402. Available Regulatory Relief from Underlying Hazardous Constituent (UHC) Requirements	ENCORE	SEP 24, 2020
1403. Smoke Detector Disposal and the NRC	ENCORE	OCT 1, 2020
1404. DOT Shipping of Damaged, Defective, or Recalled Lithium Batteries	ENCORE	OCT 8, 2020
1405. Conservative Declaration that Material is a Hazardous Waste	ENCORE	OCT 15, 2020
1406. Manifest Exception Report Submittal Timeframes – RCRA vs. TSCA	ENCORE	OCT 22, 2020
1407. Characteristic Ignitable, Corrosive or Reactive Debris and Macroencapsulation	ENCORE	OCT 29, 2020
1408. RCRA Satellite Accumulation Areas and Applicability of Personnel Training		NOV 5, 2020
1409. The Hazardous Waste Generator Improvements Rule and Designation of Nonhazardous Waste		NOV 12, 2020
1410. RCRA Aisle Space Requirements and Washington State vs., EPA		NOV 19, 2020
1411. The Definition of Good Housekeeping	ENCORE	NOV 24, 2020
1412. Absorbent Additions and Treatment	ENCORE	DEC 3, 2020
1413. LDR Notifications and F001-F005 Constituents of Concern	ENCORE	DEC 10, 2020
1414. LDR Notifications and F001-F005 Constituents of Concern – Again!	ENCORE	DEC 17, 2020
1415. 'Twas the Night before Christmas – The Twenty-Seventh Edition		DEC 24, 2020
1416. LDR Notifications and F001-F005 Constituents of Concern - One Last Time!	ENCORE	DEC 31, 2020
1417. RCRA Empty Containers and Removing as Much Waste as Possible	ENCORE	JAN 7, 2021
1418. Universal Waste, Incandescent Bulbs and Nonhazardous Bulbs	ENCORE	JAN 14, 2021
1419. Listed Waste Codes and Pre-RCRA Wastes	ENCORE	JAN 21, 2021
1420. Commercial Chemical Products and Unused Batteries	ENCORE	JAN 28, 2021
1421. Recycling of Non-Listed Commercial Chemical Products	ENCORE	FEB 4, 2021
1422. RCRA Personnel Training and Classroom Training vs. Online Training	ENCORE	FEB 11, 2021
1423. EPA Definition of "Annual" Refresher Training	ENCORE	FEB 18, 2021
1424. Satellite Accumulation of Aerosol Cans and Determining the 55-Gallon Limit	ENCORE	FEB 25, 2021
1425. PCB Wastes and RCRA Hazardous Waste Characteristics D018 through D043	ENCORE	MAR 4, 2021
1426. PCB Containers and Empty Requirements	ENCORE	MAR 11, 2021
1427. PCB Containers and Empty Requirements II	ENCORE	MAR 18, 2021
1428. PCB Containers and Decontamination Requirements	ENCORE	MAR 25, 2021

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TWO MINUTE TRAINING

TO: CENTRAL PLATEAU CLEANUP COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert
CPCCo Environmental Protection, Hanford, WA

SUBJECT: PCB CONTAINERS AND DECONTAMINATION REQUIREMENTS

DATE: MARCH 25, 2021

<u>CPCCo Projects</u>	<u>CPCCo - Env. Protection</u>	<u>HMIS</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Tania Bates Rene Catlow Richard Clinton Stuart Hildreth Stephanie Johansen Sasa Kosjerina Richard Lipinski Stuart Mortensen Dave Richards Sean Sexton Dave Shea Phil Sheely Jeff Westcott	Jeff Bramson Bob Bullock Frank Carleo Danielle Collins Jennifer Copeland Jeanne Elkins Ryan Fisher Jonathan Fullmer Steve Heninger Julie Johanson Barry Lawrence Diane Leist Mitch Marrott Stewart McMahand Brian Mitcheltree Anthony Nagel Chris Plager Linda Petersen Brent Porter Dale Snyder Kat Thompson Wayne Toebe Daniel Turlington Britt Wilkins	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 Containers and Decontamination Requirements

Q: The previous two 2MTs concerned TSCA disposal requirements for PCB containers that held either ≥ 50 and < 500 ppm PCBs, or ≥ 500 ppm PCBs. However, what happens if the customer decides that the container is worth keeping for reuse? What would be required to decontaminate a PCB container for use as a non-TSCA regulated container?

A: Per 40 CFR 761.60(c)(1), "unless decontaminated in compliance with §761.79", PCB containers must be drained and appropriately disposed. Decontamination per 40 CFR 761.79(c)(1), requires that the PCB container be decontaminated by:

- Triple rinsing the internal surfaces of the container,
- Using a solvent containing < 50 ppm PCBs, and
- Using a solvent rinse volume that equals approximately 10% of the container's capacity.

Note that the solubility of PCBs in any solvent used for decontamination must be 5% or more by weight and that the solvent can be reused for decontamination so long as its PCB concentration is < 50 ppm. The solvent rinsate must be disposed of per 40 CFR 761.79(g) which states that a hydrocarbon solvent at an existing concentration of < 50 ppm must be burned for energy recovery as a used oil, incinerated or decontaminated. If the solvent is a chlorinated solvent at any concentration or a hydrocarbon solvent at an existing concentration of ≥ 50 ppm, these solvents must be incinerated or decontaminated.

Note that per 40 CFR 761.79(f), confirmatory sampling is not required for a PCB container decontaminated per 40 CFR 761.79(c). However, the customer must maintain a written record for 3 years following decontamination documenting compliance with the decontamination procedures.

And finally per 40 CFR 761.20(c)(5), once the container is decontaminated, TSCA requirements no longer apply.

SUMMARY:

- A customer can decontaminate a PCB Container by triple rinsing with an appropriate solvent.
- The PCB-solvent rinse must be disposed via burning for energy recovery, incineration or decontamination as applicable.
- Once decontaminated, the container is no longer subject to TSCA.

Multiple pertinent excerpts from 40 CFR 761 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.

FROM: Paul W. Martin

DATE: 3/25/2021

FILE: 2MT\2021\032521.rtf

PG: 1

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TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Containers and Decontamination Requirements

40 CFR 761.3 Definitions.

PCB Container means any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.

40 CFR 761.20(c)(5) Decontaminated materials.

Any person may distribute in commerce equipment, structures, or other liquid or non-liquid materials that were contaminated with PCBs ≥ 50 ppm, including those not otherwise authorized for distribution in commerce under this part, provided that one of the following applies:

- (i) The materials were decontaminated in accordance with a TSCA PCB disposal approval issued under subpart D of this part, with §761.79, or with applicable EPA PCB spill cleanup policies in effect at the time of the decontamination.

40 CFR 761.60 Disposal requirements.

(c) PCB Containers.

- (1) **Unless decontaminated in compliance with §761.79** or as provided in paragraph (c)(2) of this section, a PCB container with PCB concentrations at 500 ppm or greater shall be disposed of:
 - (i) In an incinerator which complies with §761.70, or
 - (ii) In a chemical waste landfill that complies with §761.75; provided that if there are PCBs in a liquid state, the PCB Container shall first be drained and the PCB liquid disposed of in accordance with paragraph (a) of this section.
- (2) Any PCB Container used to contain only PCBs at a concentration less than 500 ppm shall be disposed of as municipal solid wastes; provided that if the PCBs are in a liquid state, the PCB Container shall first be drained and the PCB liquid shall be disposed of in accordance with paragraph (a) of this section.
- (3) Prior to disposal, a PCB container with PCB concentrations at 50 ppm or greater shall be stored in a unit which complies with §761.65.

40 CFR 761.79 Decontamination standards and procedures.

- (c) Self-implementing decontamination procedures. The following self-implementing decontamination procedures are available as an alternative to the measurement-based decontamination methods specified in paragraph (b) of this section. Any person performing self-implementing decontamination must comply with one of the following procedures.
 - (1) **Any person decontaminating a PCB Container must do so by flushing the internal surfaces of the container three times with a solvent containing <50 ppm PCBs. Each rinse shall use a volume of the flushing solvent equal to approximately 10 percent of the PCB Container capacity.**

TWO MINUTE TRAINING – ATTACHMENT

SUBJECT: PCB Containers and Decontamination Requirements

40 CFR 761.79 Decontamination standards and procedures.

- (d) **Decontamination solvents.**
- (1) Unless otherwise provided in paragraphs (c)(3) through (c)(5) of this section, the solubility of PCBs in any solvent used for purposes of decontamination under this section must be 5 percent or more by weight.
 - (2) The solvent may be reused for decontamination so long as its PCB concentration is <50 ppm.
 - (3) Solvent shall be disposed of under paragraph (g) of this section.
- (f) Sampling and recordkeeping.
- (2) Confirmatory sampling is not required for self-implementing decontamination procedures under paragraph (c) of this section. Any person using these procedures must retain a written record documenting compliance with the procedures for 3 years after completion of the decontamination procedures (e.g., video recordings, photographs).
- (g) Decontamination waste and residues.
- Decontamination waste and residues shall be disposed of at their existing PCB concentration unless otherwise specified.**
- (3) Hydrocarbon solvent used or reused for decontamination under this section that contains <50 ppm PCB must be burned and marketed in accordance with the requirements for used oil in §761.20(e), disposed of in accordance with §761.60(a) [*incinerator/high efficiency boiler*] or (e) [*incinerator alternative*], or decontaminated pursuant to this section.
 - (4) Chlorinated solvent at any PCB concentration used for decontamination under this section shall be disposed of in an incinerator operating in compliance with §761.70, or decontaminated pursuant to this section.
 - (5) Solvents \geq 50 ppm other than those described in paragraphs (g)(3) and (g)(4) of this section shall be disposed of in accordance with §761.60(a) or decontaminated pursuant to this section.
 - (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) [*municipal/nonmunicipal solid waste landfill, RCRA landfill, PCB disposal facility*].