

<u>SUBJECT</u>		<u>DATE</u>
1448.	Definitions of Inactive Portion, Active Portion and Closed Portion of a RCRA TSD	AUG 12, 2021
1449.	Dangerous Waste Designations and Dangerous Waste Code Determinations	AUG 19, 2021
1450.	Method Detection Limits and Hazardous Waste Determinations	ENCORE AUG 26, 2021
1451.	Method Detection Limits and Hazardous Waste Determinations II	ENCORE SEP 2, 2021
1452.	Totals Analysis vs. TCLP and Dividing by 20	ENCORE SEP 9, 2021
1453.	Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE SEP 16, 2021
1454.	Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE SEP 23, 2021
1455.	Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE SEP 30, 2021
1456.	The "Derived from Rule", the "Mixtures Rule", and the "Contained-In Policy"	ENCORE OCT 7, 2021
1457.	Hazardous Debris and Options to Exclude as a Dangerous Waste	OCT 14, 2021
1458.	Regulatory Status of Characteristic Baghouse Dust Destined for Reclamation	OCT 21, 2021
1459.	RCRA Point of Generation and Baghouse Dust Collection Systems	OCT 28, 2021
1460.	Pumps Containing Liquid Hazardous Wastes and Liquids in Landfill Prohibition	ENCORE NOV 4, 2021
1461.	Pumps Containing Liquid Hazardous Waste and Land Disposal Restrictions	ENCORE NOV 11, 2021
1462.	Pumps Containing Liquid Hazardous Wastes and RCRA Empty Containers	NOV 18, 2021
1463.	Multiple Characteristic Hazardous Waste Codes and Underlying Hazardous Constituents	ENCORE NOV 23, 2021
1464.	LDR Notifications/Certifications and Generator Permitted Treatment, Storage, or Disposal Facility	ENCORE DEC 2, 2021
1465.	Multiple Characteristic and Listed Hazardous Waste Codes and the "in lieu of" LDR Principle	ENCORE DEC 9, 2021
1466.	Universal Wastes - Recycling versus Disposal	ENCORE DEC 16, 2021
1467.	'Twas the Night Before Christmas – The Twenty-Eighth Edition	DEC 24, 2021
1468.	Spent Lead Acid Batteries vs., Universal Wastes	ENCORE DEC 30, 2021
1469.	Hazardous Debris and Radioactively Contaminated Cadmium Batteries	ENCORE JAN 6, 2022
1470.	Hazardous Debris and Radioactively Contaminated Lead-Acid Batteries	ENCORE JAN 13, 2022
1471.	Mercury Wet Cell Batteries - Debris or Not Debris	ENCORE JAN 20, 2022
1472.	Hazardous Debris and Non-Radioactive Lead Acid Batteries	ENCORE JAN 27, 2022
1473.	Hazardous Debris and LDR High/Low Mercury Subcategories	ENCORE FEB 3, 2022
1474.	Central Accumulation Areas and the ≤90-day Time Frame	ENCORE FEB 10, 2022
1475.	Central Accumulation Areas with Satellite Accumulation	FEB 17, 2022
1476.	Definition of RCRA Empty Tank	ENCORE FEB 24, 2022
1477.	RCRA Empty Acutely Hazardous Waste Containers	ENCORE MAR 3, 2022
1478.	The RCRA Definition of Acute Hazardous Waste	MAR 10, 2022
1479.	Regulatory Status of Liquids and Solids Separated from D001 High TOC Wastes	ENCORE MAR 17, 2022
1480.	Generator Accumulation at a Permitted Storage Facility	MAR 24, 2022
1481.	Generator Accumulation and Maximum Inventory of Dangerous Waste Onsite at a RCRA TSD	MAR 31, 2022
1482.	LDR Storage Prohibitions and the One-Year Rule	ENCORE APR 7, 2022
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1484.	LDR Storage Prohibitions and Treated Hazardous Debris or Contaminated Soil	ENCORE APR 21, 2022
1485.	Satellite Accumulation, the Three-Day Rule, and Washington State vs. EPA	ENCORE APR 28, 2022
1486.	Satellite Accumulation Areas and the Three-Day Accumulation Time Limit	ENCORE MAY 5, 2022
1487.	Satellite Accumulation Areas and the Three-Day vs., the 72-Hour Accumulation Time Limit	MAY 12, 2022
1488.	RCRA and New Point of Generation	ENCORE MAY 19, 2022
1489.	High Mercury vs. Low Mercury and Point of Generation	ENCORE MAY 26, 2022
1490.	Nonwastewater vs., Wastewater – The LDR Definitions	JUN 2, 2022
1491.	LDR Treatability Groups and Applicability of LDR Treatment Standards	JUN 9, 2022
1492.	Land Disposal Restricted vs. Land Disposal Prohibited	ENCORE JUN 16, 2022
1493.	RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario I	ENCORE JUN 23, 2022

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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:** RCRA EMPTY CONTAINERS VS. TSCA PCB DECONTAMINATED CONTAINERS - SCENARIO I

**DATE:** JUNE 23, 2022

<u>CPCCo Projects</u>	<u>CPCCo Functionals</u>	<u>HMIS</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
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## TWO MINUTE TRAINING

**SUBJECT:** RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario I

**Q:** A customer has a drained 55-gallon waste drum that had contained a material regulated as a RCRA "F" listed non-acutely hazardous waste, and also as a TSCA PCB contaminated waste (PCB concentration  $\geq 50$  ppm and  $< 500$  ppm). The customer wants to render this container RCRA empty, and PCB decontaminated and then reuse the container for other wastes. The customer does not want to be concerned with "carry through" to subsequent wastestreams of any previous RCRA listed waste codes or PCB contamination. What must the customer do in order to render this drum reusable in terms of RCRA and TSCA PCB requirements?

**A:** In terms of RCRA, the customer must render the drum RCRA empty for a non-acutely hazardous waste. Per [WAC 173-303-160\(2\)](#) [[40 CFR 261.7](#)] the container must be emptied as much as possible and contain no more than 1 inch, or no more than 3% (if the container is  $\leq 119$  gallons) by volume of residues. Once this criterion is achieved for a non-acutely hazardous waste, the residues remaining in the RCRA empty container are no longer subject to RCRA [[WAC 173-303-160\(3\)](#)]. Note that the residues removed from the RCRA container remain an F listed hazardous waste.

In terms of TSCA PCB, the customer must decontaminate the drum for PCBs. Per [40 CFR 761.79\(c\)\(1\)](#) the PCB container must be triple rinsed with an appropriate solvent, as defined in [761.79\(d\)\(1\) - \(3\)](#). Each rinse volume must equal 10% of the PCB container's capacity. Once this criteria is achieved for a PCB container, the container can be used or reused as authorized at [40 CFR 761.30\(u\)](#). Note that the solvent rinsate must be managed as a PCB liquid per [40 CFR 761.60\(a\)](#). Also note that both RCRA and TSCA PCB "empty" criteria apply to liquids and non-liquids, and confirmation analyses is not required.

Since the customer has a container that formerly contained a RCRA "F" listed hazardous waste (non-acute), and a TSCA PCB contaminated waste, the customer must meet both the RCRA and TSCA requirements concerning rendering a drum RCRA empty and PCB decontaminated. In this specific case, if the customer decontaminated the drum for PCBs by triple rinsing the container, and completely emptying the rinsate, the drum would be empty/decontaminated and therefore reusable in terms of both RCRA and TSCA PCB.

NOTE: The sequence of rendering the container RCRA empty and TSCA decontaminated must be considered. If the container is RCRA emptied first, and then TSCA decontaminated via triple rinsing, the F listed waste codes would not carry through to the PCB rinsate because the RCRA empty process removed the listed waste codes. However, if the container was not RCRA emptied first, the PCB rinsate from triple rinsing would carry the F listed hazardous waste codes because these codes were present in the container at the time of triple rinsing. At the completion of triple rinsing, the container would be RCRA empty and TSCA PCB decontaminated, but the rinsate would be regulated for PCBs and the F listed hazardous waste codes.

### SUMMARY:

- A RCRA non-acutely hazardous waste container is RCRA empty when emptied as much as possible and contains no more than 1 inch or no more than 3% by volume of residues.
- A TSCA PCB contaminated container is TSCA decontaminated when triple rinsed with an appropriate solvent and each rinse equals 10% of the drum's capacity.
- A RCRA/TSCA container meeting both of the above criteria, is suitable for reuse.

Excerpts from WAC 173-303-160 and 40 CFR 761 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:** 6/23/2022

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## TWO MINUTE TRAINING – ATTACHMENT

**SUBJECT:** RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario I

**WAC 173-303-160 Containers.**

(2) A container or inner liner is "empty" when:

(a) All wastes in it have been taken out that can be removed using practices commonly employed to remove materials from that type of container or inner liner (for example, pouring, pumping, aspirating, etc.) and:

- (i) No more than one inch of waste remains at the bottom of the container or inner liner; or
- (ii) No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 119 gallons in size; or
- (iii) No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 119 gallons in size.

(3)

(a) Any residues remaining in containers or inner liners that are "empty" as described in subsection (2) of this section will not be subject to the requirements of this chapter, and will not be considered as accumulated wastes for the purposes of calculating waste quantities.

### **40 CFR 761.79 Decontamination standards and procedures.**

(a) *Applicability.* This section establishes decontamination standards and procedures for removing PCBs, which are regulated for disposal, from water, organic liquids, non-porous surfaces (including scrap metal from disassembled electrical equipment), concrete, and non-porous surfaces covered with a porous surface, such as paint or coating on metal.

(3) Materials from which PCBs have been removed by decontamination in accordance with this section may be used or reused in accordance with §761.30(u).

(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.

### **40 CFR 761.30 Authorizations.**

(u) *Use of decontaminated materials.*

(1) Any person may use equipment, structures, other non-liquid or liquid materials that were contaminated with PCBs during manufacture, use, servicing, or because of spills from, or proximity to, PCBs  $\geq 50$  ppm, including those not otherwise authorized for use under this part, provided:

(i) The materials were decontaminated in accordance with:

(B) Section 761.79; or...

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