

<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
1483. LDR Storage Prohibitions and Treated Hazardous Wastes	ENCORE	APR 14, 2022
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
1494. RCRA Empty Containers vs. TSCA PCB Decontaminated Containers - Scenario II	ENCORE	JUN 30, 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 II

DATE: JUNE 30, 2022

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TWO MINUTE TRAINING

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

Q: Last week's "Two Minute Training" (2MT) discussed requirements for rendering reusable, a drained 55-gallon waste container 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 ≥ 50 ppm and < 500 ppm). What if the drained container had contained a material regulated as a RCRA "P" listed acutely hazardous waste, and a TSCA PCB waste (PCB concentration ≥ 500 ppm)? Again, the customer does not want to be concerned with "carry through" of any previous RCRA waste codes or PCB contamination to the subsequent waste streams. What must the customer do to render this container reusable per RCRA and TSCA requirements?

A: In terms of RCRA, the customer must render the container RCRA empty for an acutely hazardous waste. Per [WAC 173-303-160\(2\)\(b\)](#) [[40 CFR 261.7](#)] the container can be rinsed at least three times with an appropriate cleaner or solvent. The volume of solvent used for each rinsing must be 10% or more of the container's capacity or of sufficient quantity to decontaminate thoroughly the container. Note that the residues removed from the RCRA empty container remain a P-listed hazardous waste.

In terms of TSCA, the customer must decontaminate the container for PCBs. Per [40 CFR 761.79\(c\)\(1\)](#) the container must be triple rinsed with an appropriate solvent, as defined in [761.79\(d\)\(1\) - \(3\)](#). Each rinse volume must equal approximately 10% of the PCB container's capacity. Once these criteria are achieved for a PCB container, the container can be used or reused as authorized at [40 CFR 761.30\(u\)](#). Note that the decontamination requirements are the same regardless of PCB concentration (≥ 50 to < 500 or ≥ 500), and very similar to the emptying requirements for a RCRA acutely hazardous waste. Also note that the solvent rinsate must be managed as a PCB liquid per [40 CFR 761.60\(a\)](#), i.e., thermal treatment.

Lastly - note the different solvent rinse volumes for RCRA (10% or more) vs., TSCA (approximately 10%).

Since the customer's container had contained a RCRA P-listed acutely hazardous waste, and a TSCA PCB waste, the customer must meet both the RCRA and TSCA requirements concerning rendering a container RCRA empty and PCB decontaminated. In this case, when the container is triple rinsed with appropriate types and volumes of solvents, the container would be reusable.

SUMMARY:

- A RCRA acutely hazardous waste container can be RCRA emptied when triple rinsed with an appropriate cleaner or solvent and each rinse equals 10% or more of the container's capacity or is of sufficient quantity to decontaminate thoroughly the container.
- A TSCA PCB container is TSCA decontaminated when triple rinsed with an appropriate solvent and each rinse equals approximately 10% of the container's capacity.
- A RCRA/TSCA container meeting both decontamination criteria is no longer subject to RCRA or TSCA regulation and is therefore suitable for reuse.

Excerpts from WAC 173-303-160(2) and 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: 6/30/2022

FILE: 2MT\2022\063022.rtf

PG: 1

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TWO MINUTE TRAINING - ATTACHMENT

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

WAC 173-303-160 Containers.

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

(b) If the container or inner liner held acutely hazardous waste, as defined in WAC 173-303-040, toxic EHW as defined in WAC 173-303-100 or pesticides bearing the danger or warning label, the container or inner liner has been rinsed at least three times with an appropriate cleaner or solvent. The volume of cleaner or solvent used for each rinsing must be ten percent or more of the container's or inner liner's capacity or of sufficient quantity to thoroughly decontaminate the container. In lieu of rinsing for containers that might be damaged or made unusable by rinsing with liquids (for example, fiber or cardboard containers without inner liners), an empty container may be vacuum cleaned, struck, with the open end of the container up, three times (for example, on the ground, with a hammer or hand) to remove or loosen particles from the inner walls and corners, and vacuum cleaned again...

(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.

(b) Any dangerous waste in either: A container that is not empty, or an inner liner removed from a container that is not empty (as defined in subsection (2) of this section) is subject to the requirements of this chapter.

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 ≥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...