

<u>SUBJECT</u>		<u>DATE</u>
1501. RCRA Empty Containers and The Debris Rule	ENCORE	AUG 25, 2022
1502. Exceptions to Free Liquids in Landfills Prohibition	ENCORE	SEP 1, 2022
1503. Dust Suppression in Landfills using Nonhazardous Liquids	ENCORE	SEP 8, 2022
1504. Treated Hazardous Wastes Used as Dust Suppressant	ENCORE	SEP 15, 2022
1505. LDR One-Year Storage Prohibition and Generator Permitted Storage	ENCORE	SEP 22, 2022
1506. LDR Notifications and Generator Permitted Storage	ENCORE	SEP 29, 2022
1507. Satellite Accumulation and the One-Year LDR Prohibitions on Storage	ENCORE	OCT 6, 2022
1508. PCB Bulk Product Waste vs. PCB Remediation Waste	ENCORE	OCT 13, 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: PCB BULK PRODUCT WASTE VS. PCB REMEDIATION WASTE

DATE: OCTOBER 13, 2022

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TWO MINUTE TRAINING

SUBJECT: PCB Bulk Product Waste vs. PCB Remediation Waste

Q: A customer has two drums of building bricks that were coated with a paint that contained PCBs ≥ 50 ppm as an ingredient, i.e., not the result of a spill. One drum (#1) has bricks from a room where a previous owner had scraped the PCB paint from the bricks and the drum contains both the bricks and the paint chips. The other drum (#2) has bricks from a room where the PCB paint was still adhering to the bricks and this drum now contains PCB painted bricks. What is the PCB waste classification for these two drums of waste?

A: Drum #1 with PCB paint chips and bricks that have been scraped of paint contains PCB Bulk Product Waste and PCB Remediation Wastes. This wastestream would have to be segregated as paint chips and as bricks in order to manage the paint chips as PCB Bulk Product Waste, and the bricks as PCB Remediation Waste. Or the customer could manage the entire drum as PCB Remediation Waste since that would be the more stringent requirement. Drum #2 with PCB paint adhering to the bricks is PCB Bulk Product Waste and could include bricks where the paint chips flaked off the bricks after designation.

On February 29, 2012, EPA published a proposed Federal Register requesting comment on a reinterpretation which would classify building materials coated or serviced with PCB Bulk Product Waste at the time of disposal to be managed as PCB Bulk Product Waste. This meant that if a brick was painted with PCB paint and the paint was still adhering to the brick, the brick and the paint could be managed as PCB Bulk Product Waste. However, if at the point of disposal, the paint had separated from the brick, only the paint was PCB Bulk Product Waste. The brick would have to be managed as PCB Remediation Wastes.

In response to comments, EPA modified the proposed reinterpretation as documented in an EPA letter dated October 24, 2012. The reinterpretation allows classification to occur at the time of designation for disposal as opposed to at the point of disposal. The benefit is that if at the time of designation the PCB paint is still adhering to the brick, the painted brick is a PCB Bulk Product Waste and remains so even if the PCB paint later separates from the brick prior to disposal. If PCB paint has already separated from the brick at the time of designation, the PCB paint is PCB Bulk Product Waste, but the brick is PCB Remediation Waste.

SUMMARY:

- On October 24, 2012, EPA issued a reinterpretation that the determination of PCB Bulk Product Waste and PCB Remediation Waste occurs at the point of designation as opposed to the point of disposal.
- If PCB Bulk Product Waste is separated from the substrate after designation, both components remain PCB Bulk Product Waste.
- If PCB Bulk Product Waste is separated from the substrate before designation, the substrate is PCB Remediation Waste.

See the [PCB Guidance Reinterpretation](#) which also includes a link to the October 24, 2012, EPA memorandum. If you have any questions, please contact me at Paul_W_Martin@rl.gov or at (509) 376-6620.