

<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
1509. PCB Date Removed From Service Notations – On the Item or In a Log	ENCORE	OCT 20, 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 DATE REMOVED FROM SERVICE NOTATIONS – ON THE ITEM OR IN A LOG

DATE: OCTOBER 20, 2022

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TWO MINUTE TRAINING

SUBJECT: PCB Date Removed From Service Notations – On the Item or In a Log

Q: A customer is storing for disposal several PCB capacitors. The customer is aware that PCB items must be dated when they are removed from service for disposal. As opposed to noting the date removed from service (DRFS) on each individual PCB capacitor, the customer would like to maintain a log of PCB capacitors by serial number, location and the DRFS. If the customer maintains a DRFS log, would the log be in compliance with the DRFS requirements of [40 CFR 761.65\(c\)\(8\)](#)?

A: An excerpt from 40 CFR 761.65(c)(8), states:

“PCB Items shall be dated on the item when they are removed from service for disposal. The storage shall be managed so that the PCB Items can be located by this date.”

A key phrase in the above wording is that the PCB items shall be dated “on the item”. Placing a date on the item implies that the item itself must be dated as opposed to maintaining a log.

As further clarification, the [1994 PCB Question and Answer Manual](#) on page II-8 states:

Q7: Does each large PCB Capacitor in storage for disposal have to be dated, or would a storage log or list indicating these dates be sufficient?

A7: Each PCB Article, including individual PCB Capacitors, must be dated on the article when placed into storage for disposal [761.65(c)(8)]. Consequently, the mere listing of dates on a storage log or list is not sufficient.

Note that per [40 CFR 761.3](#), “Definitions”, PCB item means “any PCB Article (such as PCB capacitors), PCB Article Container, PCB Container, PCB Equipment, or anything that deliberately or unintentionally contains or has as a part of it any PCB or PCBs”.

Therefore the customer’s PCB capacitors, and any other PCB items, must have the DRFS individually noted on the item in order to comply with 40 CFR 761.65(c)(8), as opposed to maintaining a DRFS log.

SUMMARY:

- PCB items must be noted with the date removed from service for disposal.
- The date removed from service must be noted on the item.
- Maintaining a log of dates removed from service would not meet 40 CFR 761.65(c)(8).

Nothing is attached to the email. 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.