

<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
1510. The Mad Scientist, Laboratory Standards and "U" and "P" Hazardous Waste Listings	ENCORE	OCT 27, 2022
1511. The Date Removed From Service Marking on the PCB Mark	ENCORE	NOV 3, 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:** THE DATE REMOVED FROM SERVICE MARKING ON THE PCB MARK

**DATE:** NOVEMBER 3, 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>
Janine Baker Tania Bates Theresa Boles Justin Bolles James Brack Rene Catlow Richard Clinton Patty Drago Ryan Fisher Andrew Getz Cory Grabeel Lawanda Grow Char Hall Stuart Hildreth Aprill Jivelekas Sasa Kosjerina William Krueger Richard Lipinski Stuart Mortensen Edward Myers Trey Reppe Melissa Sahn-dame Seth Slater Phil Sheely Kat Thompson Jeff Westcott Richard Willson Nick Wood Jon Wright	Sara Austin Bob Bullock Frank Carleo Bob Cathel Stacy Cutter Jeanne Elkins Jonathan Fullmer Randal Fox Alison Greene Sarah Horn John Hultman Julie Johanson Mitch Marrott Morgan Matson Stewart McMahand Carlie Michaelis Brian Mitcheltree Anthony Nagel Chris Plager Linda Petersen Brent Porter Sean Sexton Dave Shea Deborah Singleton Dale Snyder Jeremy Wall Jennifer Williams	Brett Barnes Curt Clement Mike Demiter Jerry Cammann Kelly Elsethagen Garin Erickson Katie Hall Dashia Vander Sys Mark Kamberg Jon McKibben Saul Martinez Matt Mills Carly Nelson Eric Pennala Jon Perry Dave Richards Deanna Rohlfing Christian Seavoy David Shaw John Skoglie Greg Sullivan	Dean Baker Linda Conlin Bailey Hardy Garrett Knutson Eric Van Mason Melanie Myers  <u>DOE RL, ORP, WIPP</u>  Duane Carter Ingrid Colton Tashina Jasso Tony McKarns Adolfo Perez Bryan Trimberger Robin Varljen Allison Wright	Bill Bachmann Scott Baker Michael Carlson Peter Ceton Danielle Collins Paul Crane Tina Crane Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Kip George James Hamilton Leah Hare Andy Hobbs Stephanie Johansen Ryan Johnson Mike Lowery Michael Madison Terri Mars Steve Metzger Tony Miskho Tom Moon Chuck Mulkey Michelle Oates Kirk Peterson Jeremy Rishel	Dan Saueressig Lana Strickling Joelle Moss Greg Varljen Julie Waddoups Jay Warwick Britt Wilkins Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** The Date Removed From Service Marking on the PCB Mark

**Q:** A customer with DOT experience is reluctant to handwrite the PCB Date Removed from Service (DRS) mark directly on the yellow PCB marking. The DOT hazard class labels cannot be altered in any way, or the labels are considered obliterated. This DOT knowledge has created the reluctance in the customer to handwrite the DRS on the PCB mark since the additional wording might invalidate the PCB mark. Should the customer be concerned?

**A:** We should always be concerned. 40 CFR 761.45, "Marking formats" does contain prescriptive language stating that the PCB mark shall be as shown in Figure 1 for the large mark or Figure 2 for the small mark. The size and color of the PCB mark are also stipulated. DOT on the other hand has very prescriptive language to the point that DOT does not allow the label manufacturer's name on the label unless it is "printed outside the solid line inner border in no larger than 10-point type". DOT also has prescriptive language for size, color and wording.

Further research of the regulations at 40 CFR 761, and assorted TSCA PCB Federal Registers did not reveal any clarifications of whether or not the DRS could be handwritten on the yellow PCB mark. Therefore a telephone call was made to the TSCA Hotline (202-554-1404) and the following question asked:

"Is it OK to handwrite the DRS somewhere on the PCB mark as long as it does not interfere with the prescribed wording?"

The Hotline referred the question to Mr. Winston Lue at TSCA EPA Headquarters (HQ) and after one clarifying telephone call and a few additional e-mails, Mr. Winston and Mr. Tom Simons, also of TSCA EPA HQ concurred that it was not an issue to handwrite the DRS on the PCB mark as long as the other PCB marking wording was not overwritten.

Whew!

### SUMMARY:

- The TSCA PCB mark has prescriptive language concerning the format, size, and color of the mark
- Unlike DOT's very prescriptive label specifications, the PCB mark can include additional handwritten information such as the date removed from service.
- EPA concurred that handwriting the date removed from service on the PCB mark was not an issue.

The EPA HQ e-mail clarifications and 40 CFR 761.45 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.

## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** The Date Removed From Service Marking on the PCB Mark

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From: Martin, Paul W - CHPRC  
Sent: Wednesday, March 04, 2009, 9:50 AM  
To: 'lue.winston@epa.gov'  
Subject: PCB Mark and Date Removed From Service

Winston,

Just to confirm our telephone conversation this morning, I had asked you if it was acceptable to handwrite the date removed from service (DRS) somewhere on the yellow PCB marking that would not obscure the required PCB marking information. We've had some internal concerns raised that by adding this handwritten information to the 40 CFR 761.45 prescribed PCB Marking format, we might somehow invalidate the PCB Marking. My position has been that adding the DRS on the PCB Mark is an efficient compliance mechanism for ensuring that the PCB waste container has all required markings since all markings will be in one location on the PCB item. Your response was that handwriting the DRS on the PCB marking was acceptable assuming the DRS wording is legible and written in indelible ink like with a "Sharpie" pen.

If you concur with my summary of our telephone conversation an affirmative reply via e-mail would be appreciated.

Thanks!

Paul W. Martin  
Environmental Compliance Officer  
T Plant Complex, Hanford Site  
Department of Energy, Richland, WA  
Phone (509) 376-6620 / Cell 531-4489 / Fax 373-1539

=====  
From: Lue.Winston@epamail.epa.gov [mailto:Lue.Winston@epamail.epa.gov]  
Sent: Tuesday, March 17, 2009, 6:21 AM  
To: Martin, Paul W - CHPRC  
Cc: Finn.Molly@epamail.epa.gov; Hensley.Amy@epamail.epa.gov  
Subject: Re: FW: PCB Mark and Date Removed From Service

I concur with the email. It is okay to put a mark on the ML label as long as you are doing it to mark electrical equipment out of service.

Winston M. Lue  
Chemical Engineer  
Permits Branch  
Program Implementation and information Division, W Office of Resource Conservation  
Mail Code: 5303P U.S. EPA  
Phone - 703 305-1617 Fax - 703-308-8638

**TWO MINUTE TRAINING - ATTACHMENT**

**SUBJECT:** The Date Removed From Service Marking on the PCB Mark

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From: "Martin, Paul W - CHPRC" <Paul\_W\_Martin@RL.gov>  
To: Winston Lue/DC/USEPA/US@EPA  
Cc: Molly Finn/DC/USEPA/US@EPA, Amy Hensley/DC/USEPA/US@EPA  
Date: 1/16/16/16/1603/17/2009 12:15 PM  
Subject: RE: FW: PCB Mark and Date Removed From Service

Your reply only referenced electrical equipment. Did you intend to make a limitation? I assume it is OK to put the date removed from service (DRS) on a PCB mark that is required on any PCB item, specifically PCB waste containers.

Note that the DRS mark will not obscure any wording on the PCB mark.

Thanks for helping with this clarification.

Paul W. Martin  
Environmental Compliance Officer  
T Plant Complex  
Phone (509) 376-6620 / Cell 531-4489 / Fax 373-1539

=====

From: Winston Lue/DC/USEPA/US  
To: Martin, Paul W - CHPRC" <Paul\_W\_Martin@RL.gov>  
Cc: Molly Finn/DC/USEPA/US@EPA, Amy Hensley/DC/USEPA/US@EPA, Tom Simons/DC/USEPA/US@EPA, Jeff Gaines/DC/USEPA/US@EPA  
Date: 1/16/1603/19/2009 07:10 AM  
Subject: RE: FW: PCB Mark and Date Removed From Service

This would apply to all PCB Items, Articles, Containers, etc...

Winston M. Lue  
Chemical Engineer  
Permits Branch  
Program Implementation and information Division, W Office of Resource Conservation  
Mail Code: 5303P U.S. EPA Phone - 703 305-1617 Fax - 703-308-8638

=====

From: Simons.Tom@epamail.epa.gov [mailto:Simons.Tom@epamail.epa.gov]  
Sent: Thursday, March 19, 2009, 4:40 AM  
To: Lue.Winston@epamail.epa.gov  
Cc: Hensley.Amy@epamail.epa.gov; gaines.jeff@epamail.epa.gov; Finn.Molly@epamail.epa.gov; Martin, Paul W - CHPRC  
Subject: RE: FW: PCB Mark and Date Removed from Service

Anything that has a 1-year deadline for disposal.

Tom Simons  
Fibers and Organics Branch  
National Program Chemicals Division  
Office of Pollution Prevention and Toxics Room 4353RR (EPA East Entrance)  
Phone - 202-566-0517 Fax - 202-566-0473 Mail Code - 7404T

**TWO MINUTE TRAINING - ATTACHMENT**

**SUBJECT:** The Date Removed From Service Marking on the PCB Mark

**§40 CFR 761.45 Marking formats**

The following formats shall be used for marking:

(a) *Large PCB Mark-M<sub>L</sub>*. Mark M<sub>L</sub> shall be as shown in Figure 1, letters and striping on a white or yellow background and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The size of the mark shall be at least 15.25 cm (6 inches) on each side. If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 5 cm (2 inches) on each side.

(b) *Small PCB Mark-M<sub>s</sub>*. Mark M<sub>s</sub> shall be as shown in Figure 2, letters and striping on a white or yellow background, and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The mark shall be a rectangle 2.5 by 5 cm (1 inch by 2 inches). If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 1 by 2 cm (.4 by .8 inches).



Figure 1



Figure 2

[44 FR 31542, May 31, 1979. Redesignated at 47 FR 19527, May 6, 1982]