



DISCLAIMER*

THIS IS NOT AN ALL ENCOMPASSING LIST. THE FINAL RULE SHOULD BE CONSULTED FOR EVERY ITEM/DETAIL/RULE CHANGE TO FULLY UNDERSTAND THE SCOPE OF EFFECTS ON A COMPANY BASED ON ITS OPERATING STRUCTURE.

SUBJECT:

FINAL RULE PUBLISHED "ALTERNATE PCB EXTRACTION METHODS AND AMENDMENTS TO PCB CLEANUP AND DISPOSAL REGULATIONS" **EFFECTIVE FEBRUARY 2024**

Testing Methods

Available Extraction Methods Revised for PCBs

EPA is adding the **Method 3541** (Automated Soxhlet Extraction), **Method 3545A** (Pressurized Fluid Extraction), and **Method 3546** (Microwave Extraction) for extraction of PCBs from solid matrices; and **Method 3510C** (Separatory Funnel Liquid-Liquid Extraction), **Method 3520C** (Continuous Liquid-Liquid Extraction), and **Method 3535A** (Solid-Phase Extraction) for extraction of PCBs from aqueous matrices

Method 8082 (1996) has been removed from the Regulations and will be replaced with 8082A (2007).

846	3546 ¹¹					Regulations.
SW-846	Method 3550B	1996	Extraction	Ultrasonic Extraction		Updated to Method 3550C and Limited to Wipe Samples Only.
SW-846	Method 3550C	2007	Extraction	Ultrasonic Extraction		Replaces Method 3550B and Limited to Wipe Samples Only.
SW-846	Method 8082	1996	Determinative	Polychlorinated Biphenyls (PCBs) by Gas Chromatography		Removed from Regulations.
SW-846	Method 8082A	2007	Determinative	Polychlorinated Biphenyls (PCBs) by Gas Chromatography		Added to Regulations.

Action Items

- * Refer to Lab SOPs
- * Ensure PCB Extraction from solid matrices consistent in third party lab analysis

Performance Based Cleanup Standards (some are already understood, just verbiage changes in regulations).

1. Defining "all PCB-remediation waste" → >1ppm PCBs in performance based cleanup standards
2. Applicability provision where certain sensitive environments would not be well served by the cleanup standard and will require more stringent cleanup levels.
3. Requires verification sampling
4. Explicit recordkeeping requirements

5. 30 day post cleanup notification requirement
6. Provisions for PCB Remediation waste to be accepted into Subpart D TSCA landfills, not only RCRA Subtitle C landfills.

Flexible Provisions for “Emergency Situations” (40 CFR 761.66)

1. New section, new definition, new provisions
2. Waivers from specific requirements of PCB Spill Cleanup policy and others (excavation of visibly impacted soil rather than testing, etc.)
3. Flexibility in requirements of Cleanup policies (based on as-found PCB conc., 48 hours replaces 24)
4. Provision to clarify responsibility to comply with all other state and local regulations is not negotiable.

Regulatory Implementation Improvement

1. 761.3 Non Porous Surface will include Medium Density Plastics.
2. Approval of non leaking covered containers for accumulation of Bulk PCB Remediation Waste for 180 days.
3. Language modification for financial assurance instruments (replace RCRA with TSCA)
4. No #4 in the FR at the time of this document
5. Remove Manifest Tracking Numbers from Annual PCB Reports
6. Mandatory Form for Annual PCB Reports
7. PCB Waste Categories on the Manifests AND Annual PCB Reports (because the nomenclature does not currently match up)
 - a. EPA confirms that the revised categories of PCB waste are only applicable to manifests prepared after the effective date of the rule. (i.e. 180 days after publication)
 - b. PCB contaminated transformers to be listed under “other”

RCRA/E-Manifest User Updates (9/5/23) → changes rolling out next month

PCB Rule

New Load Types

1. ArticleInContainer - will be deactivated in Production in Feb 2024 lookup table
2. ArticleNotInContainer - will be deactivated in Production in Feb 2024 lookup table
3. BulkWaste
4. Container
5. Transformer ^{NEW}
6. HighOrLowVoltageCapacitor ^{NEW}
7. ArticleContainer ^{NEW}
8. OtherPcbOnly ^{NEW}

Sample Screen Shot needs PCB team review

Get Another PCB Information

PCB Information

Load Type	Weight in Kilograms	Earliest Date of Removal from Service
Other (PCB-Only)		MM/DD/YYYY
Type of Waste		
Copy		

Get Another PCB Information

8. Definition of "As Found Concentration" clarifies in-situ vs ex-situ
9. Refers to wording of notification of PCB clean up completion (i.e. certify rather than assume)
10. Refers to PCB Cap material PCB concentration (congener vs aroclor)
11. Refers to Deed Restrictions
12. Refers to Alternate Extraction and Analysis Methods under PCB Remediation Waste (761.61(c))
13. Refers to Alternate Extraction and Analysis Methods for PCB Bulk Produce Waste
14. Refers to Alternate Extraction and Analysis Methods for Decontaminated Material (761.79)
15. Refers to sampling remediation waste non porous surfaces (1 meter square vs 2 meter)
16. Refers to adding unit of measure to concentration of surface wipe results. (Presently missing ug)
17. Refers to updating references to ASTM Methods
18. Refers to wipe sampling requirements of natural gas pipeline (761.30(i)(4))
19. Changing language re: high efficiency boilers approvals from MODEF to PCB liquids
20. Refers to mailing address change for Annual PCB Reports (Director of the ORCR c/o EPA Headquarters) instructions will be on mandatory form
21. Refers to updating address for submission of EPA Form 7710-53
22. Adding Facility email and PCB Email address to EPA Form 7710-53
23. Modification of instructions to sample site selection for natural gas pipelines
24. Remove Reference to Method 3500B
25. Correct references to SW-846
26. Correct reference to EPA's website
27. Changing pronouns
28. Changing on site to on-site
29. Correct References to Methods for Standard Wipe Test Samples (761.253 from 761.272)
30. Incorporation by Reference

Note: This guidance does not supersede a local state's requirements. JP Compliance makes every effort to maintain local government compliance as it pertains to each facility. Each facility is required to abide by the local government's regulations.

*Questions regarding this guidance may be relayed to:
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