



WICC II Work Instruction

DIRECTIVE NO.	<u>WICCII-SOW-08.HW8B.007494</u>	APPROVED BY Signature:	<u>Original Signed by</u>
EFFECTIVE DATE:	<u>7/19/2018</u>	NAME:	<u>Marianne Simko</u>
EXPIRATION DATE:	<u>8/31/2021</u>	TITLE:	<u>Division Manager Medical and Environmental Division</u>

Responsible Office: LJT/WICCII/Environmental Office

Title: Hazardous Waste: Identification of PCB Light Ballasts

PREFACE

P.1 PURPOSE

The purpose of this Work Instruction (WI) is to establish the procedures for identifying fluorescent and other high intensity light power converters that may contain polychlorinated biphenyls (PCBs). Disposal of light ballasts containing PCBs is regulated by the Toxic Substances Control Act (TSCA). To ensure disposal occurs according to regulation, a determination of PCB content must be made prior to disposal of light ballasts. This WI outlines the procedure for making such a determination.

P.2 APPLICABILITY

This WI applies to environmental management services performed by the WICC Environmental Office at NASA Goddard Space Flight Center's Wallops Flight Facility (WFF), Wallops Island, Virginia.

P.3 REFERENCES

Not Applicable

P.4 CANCELLATION

P.5 TOOLS, EQUIPMENT, AND MATERIALS

- Personal protective equipment (PPE; Level D recommended).

P.6 SAFETY PRECAUTIONS AND WARNINGS

- Wear appropriate PPE.
- Follow Hazardous Waste Management Job Hazard Analysis.
- Technicians performing these tasks should be HAZWOPER certified in accordance with 29CFR1910.120.
- Carry communication device for weather alerts and emergency communication.

P.7 TRAINING

- HAZCOM
- HAZWOPER

P.8 RECORDS

Record Title	Record Custodian	Retention
N/A		

* *NRRS – NASA Records Retention Schedule (NPR 1441.1)*

P.9 MEASUREMENT/VERIFICATION

INSTRUCTIONS

In this document, a requirement is identified by “shall,” a good practice by “should,” permission by “may” or “can,” expectation by “will,” and descriptive material by “is.”

Verify that the ballast is not leaking. If it is leaking, take precautions to prevent release to the environment during examination.

1. Inspect the light ballast for a label with the words "PCB FREE" or "NO PCBs".
 - A. If the label has one of the above statements, then the light ballast is free of PCB contamination and the light ballast can be disposed of as non-regulated solid waste in any trash receptacle or sent to a recycling company to be recycled for its metals.
 - B. If there is a label, but the words quoted above are not printed on the label, then the light ballast may be contaminated with PCBs and it requires disposal as a hazardous waste. Look for the Safety Data Sheet (SDS) to determine absolutely that the ballast has PCBs.
 - C. Finding no label and detecting a tar-like substance around the wires indicate that the light ballast contains PCB and requires disposal as hazardous waste: Assign EPA waste code M001.
2. To further verify, check the ballast for a date stamp, (usually month/year). If the date is 1978 or older, the ballast contains PCB. If the date is 1979 or newer the ballast is free of PCBs.

IF YOU ARE IN DOUBT ABOUT POSSIBLE PCB CONTAMINATION, DISPOSE OF THE LIGHT BALLAST AS PCB WASTE.

RESPONSIBILITIES

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1. Supervisors shall:
 - a. Provide this work instruction to all employees prior to their encountering the subject activity and ensure that these steps are followed by periodic audit, testing, or retraining.
 - b. Revise this work instructions as practices or requirements change and prior to the expiration date.

2. Employees shall:
 - a. Follow safety precautions, warnings and instructions as described above.
 - b. Notify their supervisor when they become aware of changes in practice or regulation which requires an update to this work instruction.

Appendix A – Definitions

N/A

Appendix B – Acronyms

N/A

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CHANGE HISTORY LOG

Revision	Effective Date	Description of Changes
A		Initial Release
B**	7/19/2018	Changed radio to communication device in P6

***subsequent revisions will be alphabetical beginning with B. If this is the baseline version, leave this and the remaining revision blocks blank*