

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:)	
)	
Trans-Cycle Industries of Ohio, LLC)	Approval to Commercially Store
150 Ira Bean Parkway)	Polychlorinated Biphenyls (PCBs)
Richwood, Ohio 43344)	Pursuant to 40 CFR § 761.65(d)
OHW000205856)	
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AUTHORITY

This Approval to Commercially Store Polychlorinated Biphenyls (PCB) Waste is issued pursuant to section 6(e)(1) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e)(1), and 40 Code of Federal Regulations (CFR) part 761 (Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions (PCB Regulation)).

BACKGROUND

Section 6(e)(1)(A) of TSCA, 15 U.S.C. § 2605(e)(1)(A), requires that the United States Environmental Protection Agency (EPA) promulgate rules for the disposal of PCBs. Rules implementing TSCA section 6(e) were published in the May 31, 1979 Federal Register (44 Fed. Reg. 31,542) and recodified in the May 6, 1982 Federal Register (47 Fed. Reg. 19,527). Those rules also regulated the storage of PCB waste prior to disposal under the TSCA section 6(e)(1) disposal authority for PCBs. Amendments to those rules were published in the December 21, 1989 Federal Register (54 Fed. Reg. 52,746).

Trans-Cycle Industries of Ohio, LLC (TCI), performs equipment decommissioning, dismantling, and recycling services for non-PCB Items that are less than 50 parts per million (ppm) PCBs. Any regulated PCB Items, as defined by 40 CFR §761.3, are stored in the PCB storage area until shipped to EPA-approved disposal facilities. The TCI facility in Richwood, Ohio, will open in 2018.

TCI is applying for permission from EPA Region 5 under the regulations of 40 CFR § 761.65(d) to store PCBs and PCB Items with concentrations greater than 50 parts per million (ppm) at their facility in Richwood, Ohio. The Richwood facility sits on an approximately 8.65-acre property with a 50,692 square-foot building where PCB equipment will be stored and non-PCB equipment will be decommissioned and recycled. All PCB equipment will be stored in the PCB storage area until shipment to a TSCA-approved disposal facility. PCB equipment will not

be drained or recycled at the Richwood facility unless the equipment is leaking. Leaking or potentially leaking PCB equipment will be containerized, if possible, or drained into drums or totes and stored in the PCB storage area until shipment to a disposal facility.

The Application was first submitted to EPA Region 5 on September 7, 2017. On October 25, 2017, EPA issued a Notice of Deficiencies letter to TCI. TCI submitted a revised application on November 27, 2017. The November 27, 2017 application from TCI is the basis for this Approval.

APPLICABLE REGULATIONS

This Approval is developed in accordance with the applicable requirements of the PCB regulations. The rules applicable to the storage for disposal of PCBs at concentrations of 50 ppm or greater and PCB Items with PCB concentrations of 50 ppm or greater are codified at 40 CFR §§ 761.65 (Storage for disposal) and 761.180 (Records and monitoring). Such rules require, among other things, that commercial storers of PCB waste, storing regulated PCB containing material in quantities greater than 500 gallons, obtain a written approval issued by the Regional Administrator for the region in which the storage facility is located. *See* 40 CFR §§ 761.3 and 761.65(d). On July 28, 2014, this authority of the Regional Administrator was delegated to the Director, Land and Chemicals Division, EPA Region 5.

DEFINITIONS

All the terms and abbreviations used in this Approval shall have the meanings as defined in 40 CFR § 761.3 unless the context clearly indicates otherwise or unless the term is defined below for the purposes of this Approval.

“Approval” means EPA’s initial approval of the TCI Application, and any subsequent EPA approved written modifications thereto.

Application” and “TCI Application” mean the TCI Application dated November 27, 2017, and any subsequent TCI Application that EPA approves in writing as a modification to this Approval.

“Closure” means the cessation of the use of a subject facility, and activities undertaken to secure the facility and control, minimize or eliminate the threat to human health and the environment from the facility. General closure requirements for PCB commercial storage facilities are set forth in the TSCA regulations at 40 CFR § 761.65(e).

“Closure Plan” means written plan for achieving proper closure of a subject facility. The closure

plan identifies the steps that the owner or operator of the facility shall take to close the PCB wastes storage facility in a manner that eliminates the potential for post-closure releases of PCBs which may present an unreasonable risk to human health or the environment. Closure plan requirements for PCB commercial storage facilities are set forth in the TSCA regulations at 40 CFR § 761.65(e).

“Delegate” means the Director, Land and Chemicals Division, EPA Region 5.

“Director” means the Director, Land and Chemicals Division, EPA Region 5.

“EPA” means EPA Region 5.

“Major Modification” means any change to the storage areas, maximum PCB storage inventory, the closure plan, closure cost estimates, the financial plan for closure, or any other changes which affect overall performance or environmental impact.

“Minor Modification” means administrative and informational changes, correction to typographical errors, changes to conform with agency guidance or regulations, or any other change which does not affect the overall performance or environmental impact.

“Operator” means Trans-Cycle Industries of Ohio, LLC, 150 Ira Bean Parkway, Richwood, Ohio 43344, the establishment that operates the PCB storage facility.

“Owner” means Trans-Cycle Industries of Ohio, LLC, 150 Ira Bean Parkway, Richwood, Ohio 43344.

“PCB Item” means any PCB article, PCB article container, PCB container or PCB equipment, as each term is defined at 40 CFR § 761.3.

“Regional Administrator” means the Regional Administrator, EPA Region 5.

“TCI” means Trans-Cycle Industries of Ohio, LLC, the company which owns and operates a PCB commercial storage facility located at 150 Ira Bean Parkway, Richwood, Ohio, and which is approved to commercially store PCB waste under this Approval.

“TCI Facility” and “Facility” mean the PCB commercial storage facility located at 150 Ira Bean Parkway, Richwood, Ohio.

APPROVAL

TCI submitted an Application to EPA to commercially store PCBs and PCB Items for disposal at the TCI Facility, 150 Ira Bean Parkway, Richwood, Ohio, latitude North 40° 25' 01" and longitude West 83° 17' 15". Upon review of the TCI Application dated November 27, 2017, EPA has determined that all the requirements set forth in 40 CFR § 761.65(d)(2)(i)-(vii) have been met. Specifically, the Application indicates that TCI operations, storage facility, employee qualifications, closure plans, and financial plans for closure satisfy regulatory requirements. EPA approves the TCI Application to commercially store PCBs and PCB Items for disposal at the TCI Facility.

This Approval shall become effective the date the Regional Administrator or his or her delegate signs the Approval and shall expire 10 years from such date, unless suspended, revoked or terminated in accordance with the Approval's provisions, or otherwise authorized under applicable law.

This Approval does not relieve TCI from compliance with all applicable federal, state, and local regulatory requirements, including the federal PCB regulations at 40 CFR part 761.

Date: _____

Michael D. Harris
Acting Division Director
Land and Chemicals Division
U.S. Environmental Protection Agency
Region 5

Trans-Cycle Industries of Ohio, LLC
Richwood, Ohio

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I. STANDARD CONDITIONS

A. Effect of Approval

TCI may store PCBs and PCB Items in accordance with these Approval Conditions and the federal PCB regulations at 40 CFR part 761. Any storage of PCBs or PCB items not authorized in this Approval is prohibited.

Issuance of this Approval does not convey property rights of any kind or any exclusive privilege, nor does it authorize any injury to persons such as the TCI employees, agents or contractors, any property damage, any invasion of other private rights or any infringement of state or local laws or regulations.

Compliance with these Approval Conditions does not establish a defense to any other law that provides protection from any unreasonable risk to public health and the environment, including the federal PCB regulations at 40 CFR part 761.

This Approval does not relieve TCI from compliance with all applicable federal, state and local regulatory requirements, including the federal PCB regulations at 40 CFR part 761.

B. Approval Suspension/Revocation

Revocation/suspension and/or enforcement action may result for violations of any conditions of the Approval. Also, EPA PCB rulemaking or guidance could result in additional conditions or revocation.

Departure from these Approval Conditions, the approved Application or approved modification(s) to this Approval, the federal PCB regulations, or any other applicable federal, state, or local requirement without a prior written approval by EPA may result in the immediate suspension of this Approval or the commencement of proceedings to revoke this Approval or any other appropriate enforcement actions under any or all applicable statutes and regulations.

This Approval may be suspended or revoked at any time by EPA once the Director determines that the continued operation of TCI presents an unreasonable risk to human health or the environment.

C. Approval Compliance

TCI must comply and operate the Facility in accordance with section 6(e) of TSCA, 15 U.S.C § 2605(e), and the PCB Regulations, including the requirements of the PCB Spill Cleanup Policy codified at 40 CFR part 761, subpart G.

This Approval is based on the facts, representations, and certifications made by TCI in its Application dated November 27, 2017 (incorporated herein by reference). In the event that these Approval Conditions are inconsistent with the final approved Application, TCI must abide by the Approval Conditions stated herein.

D. Severability

The provisions of this Approval are severable, and if any provision of this Approval or if the application of any provision of this Approval is held invalid, the remainder of this Approval shall not be affected thereby.

E. Approval Renewal

To continue the commercial storage of PCBs and PCB Items granted by this Approval after the expiration date of this Approval, TCI must notify EPA by written notice of intention to continue the Approval at least 180 days, but not more than 270 days prior to the expiration date of this Approval.

The EPA may require TCI to submit additional information in connection with the renewal of this Approval. EPA shall review the submitted information and determine if this Approval is to be renewed.

F. Approval Expiration

This Approval shall expire 10 years from the date of issuance of this Approval. This Approval and its conditions herein will remain in effect beyond the Approval expiration date if TCI has submitted a timely, complete and adequate notice of intent to continue the Approval and, through no fault of TCI, the Regional Administrator or his or her designee has not issued an Approval renewal.

G. Approval Modification

TCI must notify EPA in writing of any facility modifications related to conditions of this Approval (operations, layout, or other, as applicable) or modifications to TCI's final approved Application.

A major modification is defined as any change to the storage areas, the maximum PCB storage inventory, the closure plan, closure cost estimates, the financial plan for closure, or any other changes which affect overall performance or environmental impact. A major modification to this Approval or the final Application shall be modified only upon the written

approval of the Regional Administrator or his or her designee.

A minor modification to this Approval or the final Application is defined as administrative and informational changes, correction to typographical errors, changes to conform to agency guidance or regulations, or any other change which does not affect overall performance or environmental impact. A minor modification to this Approval or the final Application shall be modified upon the written concurrence of the Chief of the RCRA Branch of EPA Region 5.

H. Entry and Inspection

TCI must allow EPA-authorized representative(s) to, at reasonable times:

1. Inspect TCI's property to determine compliance with this Approval or the federal PCB regulations;
2. Inspect any records that must be kept relative to this Approval or the federal PCB regulations;
3. Take sample(s) for the purpose of assessing this Approval or the federal PCB regulations; and
4. Inspect TCI's activities relative to this Approval or the federal PCB regulations.

I. Change in Ownership

EPA will recognize the transfer of this Approval to a new owner/operator if all of the following conditions are met by the date of transfer:

1. The transferee demonstrates it has established financial assurance for closure of the facility pursuant to 40 CFR § 761.65(g) using a mechanism effective as of the date of transfer so that there will be no lapse in financial assurance for closure of the transferred facility.
2. The transferee submits a new and complete Application for final storage approval, including all of the elements listed in 40 CFR § 761.65(d), and the transferee has resolved any deficiencies (e.g. technical operations, closure plans, cost estimates, etc.) that EPA identifies in its application.
3. The transferee submits a signed and notarized affidavit which states that the transferee shall comply with all the terms and conditions of this Approval.

Failure by TCI or the transferee to comply with any of the provisions of this condition shall render this Approval null and void.

J. Inapplicability of Paperwork Reduction Act

Any and all information required to be maintained or submitted pursuant to this Approval is not subject to the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501-3520, because it is information collected by EPA from a specific individual or entity for the purpose of assuring compliance with this Approval.

K. Reservations

Nothing in this Approval relieves TCI from the duty to comply with all applicable federal and State laws and regulations, including, but not limited to CERCLA, RCRA and TSCA and the regulations promulgated under those statutes.

Violation of the Approval, TSCA or the PCB regulations may subject TCI to civil or criminal enforcement action and associated penalties.

EPA reserves the right to impose additional Conditions of Approval if EPA finds such Conditions are necessary to ensure that operation of the PCB commercial storage facility does not present an unreasonable risk of injury to health or the environment from PCBs, or if EPA issues new regulations or standards for TSCA PCB storage facilities.

EPA may require the removal of some or all of the PCBs stored at the TCI facility if EPA finds such actions are necessary to ensure that the storage facility does not present an unreasonable risk of injury to health or the environment from PCBs.

TCI is responsible for the actions of its agents, assigns, employees, and contractors regarding compliance with this Approval and all federal, State and local regulations applicable to operation of the storage facility, including, but not limited to, emergency notification and reporting requirements.

II. GENERAL FACILITY CONDITIONS

A. Operation of Facility

TCI must maintain and operate the facility to prevent fire, explosion, or releases of PCBs to air, soil, ground water or surface water.

B. Sampling/Analysis

During any sampling or analysis of PCBs at the TCI facility, TCI must follow the procedures described in 40 CFR part 761 subparts N, O, and P, and/or the *EPA Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup*, as applicable.

PCB levels for liquid and non-liquid samples must be reported as total PCBs calculated by comparison to the relevant Aroclor standards.

C. Security

TCI must maintain the 6-foot fence, gate, security cameras, and alarm system currently in place; and ensure that the warehouse containing the PCB storage area is locked when the facility is closed or unmanned.

D. Personnel Training

1. All employees hired subsequent to the date of this Approval must be trained, as specified in the Training Schedule included in the Application.
2. TCI must ensure that personnel who are directly involved with handling PCBs and PCB Items are familiar with the requirements of this Approval, and the regulatory requirements under 40 CFR part 761.

E. Safety

TCI and its employees and contractors must comply with TCI's Health and Safety Plan.

TCI must ensure compliance with the applicable health and safety standards, as required by federal, state and local regulations and ordinances.

F. Spills

1. If in the course of operation, there is a spill or release of one pound or more of pure PCBs (a reportable quantity (RQ) as defined under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 40 CFR part 302, Designation Reportable Quantities and Notification) TCI must notify the National Response Center at (800) 424-8802, and EPA, Region 5, PCB Coordinator. Releases or spills of PCBs below the RQ which pose a potential for significant exposure to humans, animals, or the environment, must be reported to EPA, Region 5, PCB Coordinator at (312) 886-7435, or the Emergency Response Section at (312) 353-2318.
2. A written summary report about this incident must be submitted to EPA within five business days following the incident. When EPA requests a detailed report on the incident, this report must be submitted to EPA within 15 business days following the request. The detailed report must include, but not be limited to, a description of the spill, cleanup activities, and changes in the TCI operations to prevent such spills in the future (including any intended modifications to this Approval).
3. Cleanup of PCB spills must begin immediately pursuant to 40 CFR part 761, subpart G, PCB Spill Cleanup Policy, or 40 CFR § 761.61, PCB Remediation Waste, as applicable. The cleanup standards in the PCB Spill Cleanup Policy may only be applied for spills of PCBs that are less than 72 hours old.
4. Any debris or solid wastes generated as a result of clean up or decontamination of a PCB spill or release must be disposed of in a facility approved to dispose of PCBs under 40 CFR § 761.60 or 761.61, as applicable.

G. Location Standard

TCI must submit a written notification to the EPA, Region 5, PCB Coordinator immediately upon discovery that the site has been redesignated as being in a 100-year flood plain.

H. Emergency Procedures

TCI must, without delay, implement the appropriate safety and contingency plan measures whenever there is a fire or any PCB related emergency which could threaten human health or the environment. Safety and contingency plans must be maintained at the facility that include the names and contact information regarding the local police and fire departments, hospital and state and local emergency response teams. The local police and fire departments, hospital and state and local emergency response teams must be informed of facility operations and emergency response plans submitted to these entities as required by them. In such an emergency, TCI must notify the EPA Region 5, PCB Coordinator at (312) 886-7435, and the

Emergency Response Section at (312) 353-2318.

Safety and contingency plans must be immediately amended by TCI upon any plan failure in an emergency, change of emergency equipment, change within the facility or with personnel, or any request by EPA, Region 5, RCRA/TSCA Programs Section, and promptly submitted to the EPA, Region 5, RCRA/TSCA Programs Section.

I. Recordkeeping and Reporting

1. All reports and other information requested by EPA must be signed by the facility manager.
2. TCI must maintain the records of weekly storage inspections and routine sampling, as specified in Condition III, H and I of this Approval, and these records must be made available to EPA upon request.
3. TCI must retain all records required by this Approval and the federal PCB regulations at 40 CFR part 761 during the course of any unresolved enforcement action regarding the facility or upon request by the Regional Administrator or his or her designee, notwithstanding any other provision of this Approval or the federal PCB regulations at 40 CFR part 761.
4. TCI shall maintain records and submit annual reports to EPA as required by the PCB Regulations at 40 CFR § 761.180(b). Annual document logs and reports shall be maintained at the facility for at least 3 years after the facility is no longer used for the storage of PCBs and PCB Items.

J. Closure and Financial Requirements

1. TCI must maintain a closure plan, closure cost estimate, and financial assurance for closure, in accordance with 40 CFR § 761.65(e), (f) and (g), respectively. The facility has filed with the Regional Administrator a closure plan and financial assurance for closure in compliance with the regulatory requirements.
2. When the Regional Administrator or his or her designee approves a modification to the facility's closure plan and that modification increases the cost of closure, TCI must revise the closure cost estimate and the financial assurance mechanism, if applicable, no later than 30 days after the modification is approved.
3. During the active life of the PCB storage operations, TCI must annually adjust the closure cost estimate for inflation and for changes beyond the control of TCI which may affect disposal costs.

4. TCI must submit proof of financial assurance for closure to EPA annually. If EPA determines that the amount of financial assurance is inadequate to ensure closure, TCI must obtain additional financial assurance funding. Failure to do so will result in termination of TCI's authority to commercially store PCBs and may subject TCI to civil or criminal penalties under TSCA.
5. TCI shall notify EPA Regional Administrator in writing at least 60 days prior to the date on which closure of the PCB storage is expected to begin in accordance with 40 CFR § 761.65(e)(6)(i). EPA may request a copy of a final closure plan from TCI at this time and may require modifications to the closure plan.

III. PCB STORAGE MANAGEMENT

A. Storage Area

All PCBs and PCB Items must be stored in the approved storage areas, as identified below in Condition III.C and on Figure 4, Facility Layout, of the approved application.

B. Design Requirements of Storage Area

The PCB storage area must be maintained in accordance with the specifications in TCI's final approved application and shall meet the requirements at 40 CFR § 761.65.

TCI's facility shall meet the following storage criteria in accordance with 40 CFR § 761.65(b)(1):

1. Adequate roof and walls to prevent rain water from reaching the stored PCBs and PCB Items;
2. An adequate floor that has continuous curbing with a minimum 6-inch-high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container or 25 % of the total internal volume of all PCB Articles or PCB Containers stored at the facility, whichever is greater;
3. No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area;
4. Floors and curbing constructed of Portland cement, concrete, or a continuous, smooth, non-porous surface (as defined in § 761.3), which prevents or minimizes the penetration of PCBs;
5. Not located at a site that is below the 100-year flood water elevation.

C. Maximum PCB Storage

1. PCB Storage Area:

At any given time, TCI shall store no more than the total volume or weight of PCBs and PCB Items in the PCB storage area as identified in the table below and in the approved Application.

<u>PCB Storage Area</u>	<u>Type of Waste</u>	<u>Maximum Volume/Weight</u>
Area 1	PCB-contaminated liquids and PCB liquids in containers or articles	34,500 gallons
	Drained PCB and PCB-Contaminated Articles	20,000 pounds
	PCB Debris/Solids	80,000 pounds

TCI must maintain updated PCB inventories to ensure that the maximum PCB storage inventories, above, are not exceeded.

TCI must maintain the PCB storage area to ensure that any cracks or wearing of the epoxy sealant are repaired as needed.

2. Transfer/Transit Areas:

TCI shall store PCB Items in vehicles in transportation related areas (such as a roadway or parking area) at TCI for no more than 10 days from the date of its receipt at TCI.

3. PCB Items must be labeled with the date they were removed from service for disposal. Alternatively, containers in which the PCB Items are consolidated (i.e. 55-gallon drums) may be labeled by TCI with the removal-from-service date provided the container is dated with the date the first contained item was removed from service. When containers are labeled in this manner, each individual PCB Item contained is considered to be covered by, and subject to, the date on the container.

D. Containers

The PCB containers stored in the PCB Storage Area must be in compliance with the requirements of 40 CFR § 761.65(c)(6) or the Department of Transportation Hazardous Materials Regulations at 49 CFR parts 171-180.

The containers must be marked in the PCB storage areas and shipping/receiving areas in accordance with the requirements of 40 CFR § 761.40 and § 761.45 so that the required information on the marks, including dates of receipt and dates removed from service for disposal, are clearly and entirely visible at all times.

E. Aisle Space Requirement

Aisle space within the PCB storage areas and within the shipping/receiving areas must be

maintained at all times to allow the unobstructed movement of equipment which handles PCB items, personnel, fire protection equipment, spill control equipment and decontamination equipment.

F. Pallet Use and Drum Layer Limit

Pallets may be used to store PCB Items in the PCB storage areas. If any PCB containers are placed on a pallet, they shall be completely within the pallet edges.

TCI may stack pallets of 55-gallon drums containing liquid or non-liquid PCBs. If 55-gallon drums containing PCBs are stacked, TCI shall not stack pallets of drums over three layers. If PCB 55-gallon drums are stacked three layers high, the containers of each layer must be secured by banding them together. In addition, a pallet shall be used beneath each layer of 55-gallon drums, a maximum of four 55-gallon drums will be stored on a pallet, the bottom pallet shall always contain four 55-gallon drums before the second level of drums and pallet are added to provide a stable base.

G. Management of PCB Items

PCB containers and PCB articles at TCI must always be closed during storage, except when adding and removing their contents, and they must not be opened, handled or stored in a manner which may damage them or cause them to leak.

If any PCB container or PCB article is defective, TCI must immediately transfer the PCB waste in the container to another container that is properly marked and structurally sound.

H. Inspection Requirement

All PCB Items and PCB containers in the PCB storage areas, shipping/receiving areas, and transfer/transit areas must be inspected for leaks at least once every 30 days in accordance with § 761.65(c)(5). Any leaking PCB Item and its contents must be transferred immediately to properly marked non-leaking containers. Leaked or spilled materials must be instantly and properly cleaned up in accordance with Condition II, F. 3 of this approval and the PCB contaminated materials must be adequately disposed of in accordance with § 761.60 and/or 761.61, as applicable.

The integrity of the floor of the PCB storage areas must be inspected once each month.

The inspections conducted shall be recorded.

I. Routine Sampling Requirement

TCI must implement a sampling plan for monitoring surface contamination outside of the storage area. A minimum of five wipe samples must be collected and at least two wipe samples shall be collected from office and employee break areas. Wipe samples shall be collected using the procedures for a standard wipe test as defined in § 761.123 and the wipe samples shall be analyzed for PCBs. The timeframe for routine wipe sampling shall be once every three months. If PCBs are detected on the wipe sample, TCI shall follow the requirements of the Spill Cleanup Policy (Subpart G of 40 CFR Part 761) or the Decontamination Standards and Procedures (§761.79), as appropriate.