UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Tracy Helms
Plant Manager-Services
TCI of Alabama LLC
101 Parkway East
Pell City, Alabama 35125

RE: Commercial Storage and Alternate Decontamination
Polychlorinated Biphenyl (PCB) Approval
EPA I.D. No. ALD983167891

Dear Mr. Helms:

Thank you for the June 2019, TCI of Alabama, LLC updated application for renewal of the commercial storage and alternate decontamination PCB Approval (PCB Approval) to store, process, and decontaminate PCB waste within designated areas at the Pell City facility. Please find enclosed for your review a copy of the proposed PCB Approval and public notice documents. The proposed PCB Approval has been prepared by the U.S. Environmental Protection Agency pursuant to Section 6(e)(1) of the Toxic Substance Control Act (TSCA), 15 U.S.C. § 2605(e) and the federal PCB regulations at 40 CFR Part 761. A final decision to issue the PCB Approval will be made following the close of the public comment period.

Enclosed is a copy of the public notice announcing the proposed issuance of the PCB Approval and the associated public comment period. In accordance with the EPA Region 4's policy, the EPA will provide a thirty-day public comment period on the proposed PCB Approval. The public comment period will be held from December 17, 2019 to January 21, 2020. In addition, we have enclosed a copy of the EPA Fact Sheet for your use. On or before December 17, 2019, we request the following:

- Place a copy of the proposed PCB Approval and the TSCA PCB application in the Pell City Library
- Publish the notice in a local newspaper of general circulation (*St. Clair Times*); and
- Mail a copy of the Fact Sheet to the designated mailing list, including all residents within a 1/4-mile radius of the TCI property and all local emergency and government offices.

The Pell City Library listed in the Public Notice will serve as the repository for local citizens wishing to review the proposed PCB Approval and application documents.

If you have any questions or comments concerning the proposed PCB Approval or the public notice, please feel free to contact Terri Crosby-Vega, Environmental Engineer, (404) 562-8497 or by electronic mail at crosby-vega.terri@epa.gov.

Sincerely,

for

William C. Denman, P.E.
Chief, Redevelopment and Chemicals Branch
Land, Chemicals and Redevelopment Division

Enclosures

cc: Stephen Cobb, ADEM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

IN THE MATTER OF:

TCI of ALABAMA, LLC
101 Parkway East
Pell City, Alabama 35125

) Approval to Commercially
) Store Polychlorinated Biphenyl (PCB)
) Waste and Decontaminate
) PCB Items
) 40 CFR §§ 761.65 and 761.79(h)

AUTHORITY

This Approval to commercially store PCB waste and decontaminate PCB waste is issued by the United States Environmental Protection Agency (EPA) to TCI of Alabama, LLC (TCI) pursuant to Section 6(e) of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2605(e), and the federal regulations promulgated thereunder at 40 CFR Part 761.

Section 6(e)(1) of TSCA requires that the EPA promulgate rules pertaining to the processing, distribution in commerce, use, or disposal of PCBs. Rules implementing TSCA Section 6(e) were published in the May 31, 1979, Federal Register (44 FR 31542) and recodified in the May 6, 1982, Federal Register (47 FR 19527). Those rules also regulated the storage of PCB waste prior to disposal under TSCA Section 6(e)(1) disposal authority for PCBs. Amendments to those rules were published in the December 21, 1989, Federal Register and June 29, 1998, Federal Register (54 FR 52746 and 63 FR 35384). The current rules for PCB storage facilities are codified at 40 CFR § 761.65, "Storage for disposal." The rules for the decontamination of PCB items are codified at 40 CFR § 761.79, "Decontamination standards and procedures." The PCB regulations require, among other things, that a commercial storer of PCB waste, storing certain TSCA-regulated PCB-containing material, obtain a written approval issued by the Regional Administrator for the region in which the storage facility is located. On April 28, 2019, the authority of the Regional Administrator to issue Approvals was delegated to the Land, Chemicals and Redevelopment (LCR) Division Director.

BACKGROUND

TCI's facility is located in Pell City, Alabama on approximately 10.25 acres in St. Claire County. TCI provides utilities and major industries with equipment decommissioning, dismantling, disposal, and recycling services at their facility. TCI stores approximately 500,000 pounds of transformers and electrical equipment. There are two Storage and Processing Areas at the facility:

- Area I consists of 18,878 ft^2 and has a contiguous steel lined floor with 6 inch walls on top of the concrete in lieu of a liner.
- Area II covers 40,200 ft^2 for the back dock and has an 8-12 inch thick epoxy-sealed, reinforced concrete slab.

The rules for PCB storage facilities at 40 CFR § 761.65 require, among other things, that facilities which store PCB waste generated by others, in quantities greater than 500 gallons, obtain a written approval issued by the EPA. In addition, 40 CFR § 761.79 establishes decontamination standards and procedures for removing PCBs, which are regulated for disposal from water, organic liquids, non-porous surfaces (including scrap metal from disassembled electrical equipment), concrete, and non-porous surfaces in contact with non-liquid PCBs.

In June 1993, TCI applied for an approval for an alternative method of decontamination (AMDA) for their solvent washing/solvent distillation (SW/SD) process to decontaminate and recycle metals from PCB articles. The process proposed by TCI involves the use of a chlorinated solvent, perchloroethylene, in vapor and/or liquid form to dissolve PCBs and enable the PCB compounds to lose their cohesive and bonding characteristics which lead to their release from the metal surface of the units. The process does not use any type of thermal destruction. Once the solvent captures the PCBs released from the PCB items, the items are processed for recycling of the metals and the distilled solvent is reused for the decontamination of additional contaminated items and associated internals. A PCB demonstration test for the alternate method of decontamination was performed June 28-30, 1994. The EPA issued an AMDA for TCI's SW/SD process on May 13, 1995. However, the EPA did not issue a commercial storage Approval to TCI when it issued the AMDA and TCI continued to store PCB waste under an interim storage Approval. Prior to expiration of the AMDA in May 1998, TCI made timely submittal of a request for renewal of the AMDA.

On July 8, 1998, TCI submitted a commercial storage application and on February 4, 1999, TCI

requested approval for two alternative sampling protocols for decontamination of PCB items.

1. TCI proposed to continue using the sampling protocol specified in its expired AMDA for its SW/SD decontamination process.
2. TCI proposed a second sampling protocol to verify decontamination of metal surfaces derived from drained PCB items containing < 500 parts per million (ppm) PCBs that are processed through TCI's aqueous wash (AW) system.

The EPA issued a PCB Approval to TCI on October 22, 2001 for the commercial storage and two alternative sampling protocols for decontamination of PCB items.

A timely notice of intent to continue PCB operations was submitted by TCI on April 20, 2010, in accordance with Condition I.E of the Approval - "Approval Expiration and Continuation." Therefore, the Approval for commercial storage and two alternative protocols for decontamination of PCB items issued by the EPA in 2001, as revised in 2006, has remained in full effect until a new Approval is issued by the EPA. As requested by the EPA, TCI submitted a new application on December 5, 2016, followed by revisions to the application on June 2017, June 2019 and November 2019.

TCI utilizes a mobile dechlorination treatment unit on-site operated by Environmental Protective Services (EPS). EPS received an Approval for use of the mobile treatment unit from the EPA, Headquarters TSCA office on June 15, 2018. The EPS mobile unit is designed to treat PCB waste with PCB concentrations greater than two (2) ppm but less than 17,780 ppm in mineral oil dielectric fluid. The Approval provides that if EPS operates at a facility for 60 cumulative days or longer within any year then such operations are considered permanent operations requiring a separate Approval, except if a waiver is obtained from the EPA. The EPS mobile treatment unit currently remains under the EPA Headquarters PCB Approval Conditions for temporary use.

FINDINGS

After reviewing TCI's Application for completeness and technical adequacy and evaluating the proposed alternative sampling protocols and historical documents, the EPA has determined that the applicable regulatory criteria, identified at 40 CFR §761.65(d)(2)(i) through (d)(2)(vii) and 40 §761.79(h) have been satisfied. Specifically, the Application demonstrates that TCI's storage facility, storage capacity, decontamination handling, employee qualifications, closure plan, and financial

assurance for closure satisfy applicable requirements and that operation of the storage and processing facility and alternate decontamination, when conducted in accordance with the conditions of this Approval and all applicable provisions of the PCB regulations, will not pose an unreasonable risk of injury to health or the environment. The Conditions set forth in this Approval were developed by the EPA in accordance with the applicable requirements of 40 CFR Part 761.

APPROVAL

Approval is hereby granted to TCI, 101 Parkway East, Pell City, Alabama (EPA ID # ALD 983 167 891), to commercially store and process (disassemble and decontaminate) PCBs and PCB items for disposal, subject to the Approval Conditions stated herein.

This Approval shall become effective on the date of signature and shall expire in ten (10) years unless revoked, suspended, or terminated in accordance with the Approval Conditions stated herein. This Approval does not relieve TCI from compliance with all other applicable federal, state and local regulatory requirements, including the federal PCB regulations at 40 CFR Part 761, and any amendments or revisions thereto.

_____ _____

Carol J. Monell
Director
Land, Chemical and Redevelopment Division

Date

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I. STANDARD CONDITIONS

A. Effect of Approval

1. TCI may store and process (disassemble and decontaminate) PCBs and PCB items in accordance with these Approval Conditions and the federal PCB regulations at 40 CFR Part 761. Any storage or processing of PCBs and/or PCB items not in accordance with this Approval and/or the PCB regulations is prohibited.

2. Issuance of this Approval does not convey property rights of any part or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights or any infringement of state or local laws or regulations.

3. 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.

4. 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. 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.

C. Approval Compliance

1. TCI must comply with and operate in accordance with the provisions of the federal PCB regulations at 40 CFR Part 761 and with the Approval Conditions stated herein.

2. These Approval Conditions are based on the facts, representations, and certifications made by TCI in its Application dated December 5, 2016, as revised June 2017, and June 2019for commercial storage and alternative sampling protocol. In the event that these Approval Conditions are inconsistent with the any part of TCI's Application, TCI must abide by the Approval Conditions stated herein.

D. Approval Suspension/Revocation

1. Departure from these Approval Conditions, the TCI's Application or any approved modification(s) to this Approval, or the federal PCB regulations, without the prior written approval of the EPA may result in the immediate suspension of this Approval and/or the

commencement of proceedings to revoke this Approval and/or appropriate enforcement action under any or all applicable statutes and regulations.

2. This Approval may be suspended or revoked at any time by the EPA when it has reason to believe that the continued operation of this facility presents an unreasonable risk to human health or the environment.

E. Approval Expiration and Continuation

1. This Approval to commercially store, and process PCBs and PCB items and utilize an alternative sampling protocol shall expire ten years from the date of issuance.

2. 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 EPA has not issued an Approval renewal.

F. Approval Renewal

1. To continue the PCB storage and processing activities granted by this Approval after the expiration date of this Approval, TCI must notify the 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.

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

G. Approval Modification

1. TCI shall notify the EPA in writing of any intended modification of this Approval or TCI's approved application.

2. A "major modification" is defined as any change to the structural design of the storage areas, the maximum PCB storage inventory, changes to the sampling methods to verify decontamination specified herein, closure plan changes, or any other changes which affect overall performance or environmental impact. A major modification to this Approval or the final application shall be made only upon the written approval of the EPA Regional Administrator or his/her designee.

3. A "minor modification" is defined as administrative and informational changes, correction to typographical errors, changes to conform with agency guidance or regulations, or any other change which does not affect overall performance or environmental impact. A minor modification to this Approval or TCI's Application shall be made upon the written

concurrence of the EPA, Region 4.

H. Entry and Inspection

TCI shall allow the 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 compliance with 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

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

   a. The transferee demonstrates it has established financial assurance for closure of the facility pursuant to 40 CFR §761.65(g);

   b. TCI must maintain its financial assurance for closure until the EPA transfers this Approval, so that there will be no lapse in financial assurance for closure of the transferred facility;

   c. The transferee must submit a new Approval application for PCB commercial storage and PCB Item decontamination, including all or some of the elements listed in 40 CFR §761.65(d), as determined by the EPA;

   d. The transferee shall resolve any deficiencies the EPA has identified in its application; and

   e. The transferee shall submit a signed and notarized affidavit which states that the transferee shall comply with all the terms and Conditions of this Approval.

2. 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 et seq., because it is information collected by the EPA from a specific individual or entity for the purpose of assuring compliance with this Approval.

II. GENERAL FACILITY CONDITIONS

A. Facility Operation

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

2. All processing (disassembly and decontamination) of PCB items shall be conducted within TCI's building described in IV.A. below. Fugitive vapor and particulate emission control systems designed and operated to prevent or limit releases of PCBs and volatile organic chemicals to the air shall be maintained in proper working order.

3. Any cutting tool or other device used in processing PCB items must be operated in a manner to prevent heating of the material which may result in the vaporization of PCBs and the subsequent uncontrolled entry of PCBs to the environment.

    a. TCI shall not use a cutting torch or other thermal methods to cut PCB contaminated metal unless the unit being cut is first decontaminated to meet 40 CFR §761.79(b)(3)(i)(A); or

    b. TCI shall conduct a demonstration test to prove to the EPA's satisfaction that TCI can effectively trap and remove particulate and volatilized PCBs emissions generated from torch cutting PCB contaminated metal surfaces. Any such testing or subsequent operational use of a cutting torch on PCB contaminated surfaces requires the EPA's prior written approval.

4. In order to prevent release of PCBs to the environment and maintain a safe working environment, TCI shall follow the housekeeping and spill cleanup procedures outlined in Section V of the facility Operations Plan (Appendix B).

B. Security

The facility must be secured to restrict public access.

C. Personnel Training

1. TCI shall ensure through documented training, that personnel, who are directly involved with handling PCBs and PCB items, are familiar with the requirements of this Approval, and

regulatory requirements under 40 CFR Part 761 as they relate to specific job tasks. Training for personnel directly involved in the operation and maintenance of the PCB storage areas and alternate decontamination must include, at a minimum:

a. The types of PCB waste that may be stored;

b. Safe PCB sampling and handling procedures;

c. The location of spill response equipment and proper usage techniques;

d. The health and environmental hazards that PCBs pose to the individuals/employees and the environment;

e. Basic recordkeeping requirements under this Approval and the location of records;

f. Inspection requirements, including use of facility specific inspection forms;

g. Notification requirements;

h. Disposal requirements for regulated PCB wastes generated during the operation of the PCB storage area; and

i. Reporting requirements.

2. Training for new employees involved with managing PCBs shall be completed within 30 days of employment.

D. Safety and Health

1. TCI employees participating in decontamination activities involving $\geq$ 50 ppm PCB items shall wear or use protective clothing or equipment to protect against dermal contact or inhalation of PCBs or material containing PCBs.

2. TCI shall comply with all applicable health and safety standards, as required by federal, state and local regulations and ordinances. The Federal OSHA requirements can be found at www.osha.gov.

3. Injuries or illnesses directly related to PCB exposure or resulting from spills or handling of PCBs during the approval period, must be reported to the EPA Region 4 in writing. The report must include a description of the incident and the corrective measures or treatment provided. Within five days of completing the corrective measures and/or treatment, TCI must submit the report to:

U. S. Environmental Protection Agency
Land, Chemical and Redevelopment Division
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

E. Spills

1. TCI shall generally adhere to the spill prevention measures outlined in the Spill Prevention Control and Countermeasure (SPCC) Plan prepared by TCI. TCI shall implement applicable control measures specified in the SPCC for qualifying spill events.

2. Releases of PCBs to the environment (i.e., spills or releases of PCBs that occur outside of TCI's building) shall be cleaned up in accordance with the requirements of the PCB Spill Cleanup Policy at 40 CFR 761 Subpart G or 40 CFR §761.61, as applicable.

3. TCI shall comply with applicable PCB spill reporting requirements under the Clean Water Act and the Comprehensive Environmental Response Compensation and Liability Act.

4. If in the course of operation, there is a spill or release of one pound or more of pure PCBs (a reportable quantity [RQ] into the environment as defined under the Comprehensive Environmental Response Compensation and Liability Act, 40 CFR Part 302, "Designation, Reportable Quantities, and Notification"), TCI must immediately notify the National Response Center at (800) 424-8802. Releases or spills of ten (10) pounds or more of pure PCBs and PCB releases or spills in any amount which pose a potential for significant exposure to humans, animals, or the environment, shall be immediately reported to the NRC and to the EPA, Region 4 at (404) 562-8440, or (404)-562-8705. Further, for any spills or releases of an RQ of PCBs that leave the facility and enter the environment through any conveyance or means, TCI may be required to notify not only the NRC, but also the Local Emergency Planning Committee and the State Emergency Response Commission as required by Section 304 of the Emergency Planning and Community Right to Know Act (EPCRA), 42 U.S.C. §11004.

5. A written summary report about a reportable spill incident, as identified in the preceding paragraph, must be submitted to the EPA within five business days following the incident. When the EPA requests a detailed report on the incident, this report shall be submitted to the EPA within 15 business days following the request. The detailed report shall 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.

6. Any debris, solid wastes or liquid wastes generated as a result of clean up or decontamination of a PCB spill or release shall be disposed of in a facility approved to dispose of PCBs as required

by 40 CFR § 761.61.

F. Recordkeeping and Reporting

1. TCI must maintain at the facility: a copy of this Approval; all employees training records, the Spill Prevention Control and Countermeasure Plan; inspection records, inventory records, and records documenting sampling and analytical procedures used to determine PCB concentrations. All reports and other information requested by the EPA shall be signed by the facility manager and shall contain the certification as defined in 40 CFR § 761.3.

2. TCI must record the facility specific inspections required by Approval Conditions III.H.1 and 3 of this Approval, in a facility specific inspection log or summary. Records of inspections, training, maintenance, cleanup and disposal must be maintained at the facility in accordance with this Approval and 40 CFR § 761.180(a) and (b).

3. All records required by this Approval and/or supporting documentation must be made available to the EPA upon request during regular business hours. Inspection records must be kept three years from the date of the inspection.

4. TCI shall prepare and maintain all other records and documents, including annual records, annual document logs and annual reports as required by 40 CFR § 761.180(b). The annual report shall include a certification statement as defined in 40 CFR §761.3.

5. TCI shall retain all records required by this Approval or 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 EPA, notwithstanding any other provision of this Approval or the federal PCB regulations at 40 CFR Part 761.

6. TCI shall only send out "*Certificates of Disposal*" if the disposal/destruction/treatment has been performed on-site.

G. Closure and Financial Assurance

1. TCI must maintain a facility specific closure plan, a facility specific closure cost estimate, and corresponding financial assurance for closure, in accordance with 40 CFR §§ 761.65(e), (f) and (g), respectively. Financial assurance for closure shall be at least in the amount of the cost estimates in the closure plan estimating that the maximum PCB waste inventory be removed and treated by a third-party.

2. TCI shall submit to the EPA a written request to modify the approved closure plan whenever any of the Conditions listed in 40 CFR § 761.65(e)(4) arise.

3. When the EPA approves a modification to the facility's closure plan and that modification increases the cost of closure, TCI shall revise the closure cost estimate and the financial assurance mechanism, if applicable, no later than thirty (30) days after the modification is approved.

4. During the active life of the PCB storage operations, TCI must annually adjust the facility's closure cost estimate for inflation and for changes beyond control of TCI which may affect PCB disposal costs.

5. All financial assurance documentation and/or request for modifications shall be submitted to the EPA.

6. The type of financial assurance mechanism used by TCI may be modified with prior written approval from the EPA.

7. TCI shall keep a copy of the current closure plan, closure cost estimate financial assurance document(s) at the Pell City facility and make such documents available to the EPA inspectors for review, upon request.

H. Incapacity of Owners or Operator, Guarantors or Financial Institutions

1. TCI shall notify the EPA by certified mail of the commencement of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming the TCI as a debtor, within ten days of commencement of the proceeding.

2. If TCI uses any of the mechanisms listed in 40 CFR § 264.148(b) to establish financial assurance required by this Approval and an event identified in § 264.148(b) arises, TCI will be deemed to be without the required financial assurance and must establish other financial assurance within 60 days after such an event.

III. PCB STORAGE MANAGEMENT

A. Approved PCB Storage Area

The approved PCB storage area is the combined total 59,078 square foot, curbed and lined area of the TCI building, depicted in Figure 1. The approved storage area includes a diked tank farm used for bulk storage of dielectric fluid containing PCBs at concentrations of $\geq$ 50 ppm and a 5000 gallon steel tank used to store spent solvent containing PCBs at concentrations of $\geq$ 2 ppm.

B. Types of PCB Storage Allowed

1. TCI is authorized to store PCBs and PCB items in the following configurations:

   a. Intact and non-leaking drained and undrained PCB electrical equipment and other PCB articles shall be stored free-standing or in PCB article containers;

   b. Partially or fully disassembled, drained PCB electrical equipment and other PCB articles shall be stored free-standing, or in PCB containers;

   c. Leaking PCB articles and PCB equipment shall be stored in PCB containers;

   d. Liquid PCBs shall be stored in PCB containers, dedicated stationary bulk storage tanks or intact and non-leaking articles;

   e. Non-liquid PCBs shall be stored in PCB containers.

2. Any storage of PCBs in a manner not listed in Condition III.B.1 is prohibited.

C. Design Requirements of Storage Area

The PCB storage area as identified in Condition III.A above, shall be maintained in accordance with the requirements of 40 CFR §761.65(b)(1) and as specified in the final revised application.

D. Maximum PCB Storage

TCI is authorized to store no more than the amounts of PCBs and PCB items specified herein:

Category	Regulatory Amount	Quantity	Unit Gal or Pd
PCB-contaminated Articles with fluids	≥ 50 - < 500 ppm	6,300	G
PCB-contaminated fluid	≥ 50 - < 500 ppm	24,000	G
PCB Articles with fluids	> 500 ppm	1,100,000 Containing 24,000 G	P
PCB fluids	≥ 500 ppm	8,000	G
PCB-contaminated Articles (drained)	≥ 50 - < 500 ppm	490,000	P
PCB debris	≥ 50 ppm	250,000	P
Virgin Solvent	< 2ppm	5,000	G
Used Solvent	≥ 50 ppm	5,000	G

PCB fluids (railcar)	≥ 50 ppm	25,000	G

E. PCB Waste Storage Containers

1. Bulk stationary containers (tanks) used to store spent chlorinated solvents containing ≥ 1 ppm PCBs and dielectric fluid containing ≥ 50 ppm PCBs shall be in compliance with the requirements of 40 CFR §761.65(c)(7).

2. Containers used to store liquid or non-liquid PCB waste destined for disposal at an off-site TSCA approved disposal facility shall comply with the requirements of 40 CFR §761.65(c)(6).

F. Management of Stored PCB Items

1. TCI's storage practices shall generally conform with the procedures outlined in Section II of the facility Operations Plan (Appendix B). TCI may store PCB items in a manner that allows maximum use of space. However, PCB items must be stored in a manner that presents no danger to employees and does not impede routine inspections carried out by TCI, as required by this Approval. During compliance inspections conducted by the EPA officials or representatives, TCI will move items as requested by the inspector(s) to allow the inspector(s) full access to the facility and stored PCB items.

2. If any PCB container or PCB article is leaking, TCI shall immediately transfer the PCB waste in the container or the PCB article to a properly marked, non-leaking container. Any spilled or leaked materials shall immediately be cleaned up and the materials and residues containing PCBs shall be disposed of in accordance with §761.61.

3. No item of movable equipment that is used for handling PCBs and PCB items in the approved storage area and that comes in direct contact with PCBs shall be removed from the storage area unless it has been decontaminated as specified in 40 CFR §761.79.

G. Marking Requirements

1. The approved PCB storage areas, as well as any temporary PCB storage area authorized under Approval Conditions III.A. shall be marked as required in 40 CFR §761.40(a).

2. PCB Items in storage shall be marked in accordance with applicable requirements in 40 CFR § 761.40. PCB Items shall be dated in accordance with 40 CFR § 761.65(c)(8).

3. PCB waste storage shall be managed so that the PCB item can be located by the removal from service date or by the item's unique tracking number.

4. Any vacuum equipment or other equipment used to collect PCB decontamination residues must be labeled with the ML mark while in service and while in standby mode between uses and until properly decontaminated.

H. Inspection Requirements

1. As specified in Section V of the facility Operations Plan (Appendix B), PCB items in storage shall be checked for leaks and spills on a daily basis. TCI need not document the daily (routine) inspections. However, any spills discovered during these routine inspections shall be cleaned up expeditiously, as specified in paragraph 3, below and the cleanup shall be documented as required by 40 CFR §761.180(b)(1)(iii).

2. At least once every 30 days, as required by 40 CFR §761.65(c)(5), TCI shall conduct a thorough inspection of the entire storage facility. TCI shall document the results of the 30 day inspections. The following elements shall be included in the 30 day inspections:

    a. PCB items in storage shall be checked for leaks and spills;

    b. The PCB liquid storage tanks and the spent solvent storage tank and ancillary equipment (valves, pipelines, etc.,) shall be checked for leaks;

    c. The condition of PCB liquid and spent solvent storage tank shells, tank supports, and tank area diking shall be checked;

    d. Tank vents, high liquid level alarm systems and liquid level indicators shall be checked;

    e. The condition of floor, joints and curbing in the PCB storage area shall be checked; and

    f. Spill response and emergency equipment as described in the SPCC Plan, shall be checked and replaced or replenished as necessary.

3. PCB items found leaking on the floor will be moved to a proper containment area and/or transferred to a properly marked non-leaking container and the spill cleaned up within 24 hours of discovery. All debris, solid waste or liquids generated from a spill cleanup shall be disposed of in accordance with §761.61.

4. Any needed repairs noted during such inspections shall be made as expeditiously as possible.

IV. PCB ITEM PROCESSING

A. Processing Restrictions

1. All PCB and PCB-contaminated equipment disassembly and decontamination shall take place within the approved 59,078 square foot, curbed and lined area of the TCI building, depicted in Figure 1. The TCI building is divided into two equipment processing units. Disassembly and decontamination of equipment containing liquids with PCBs at concentrations of $\geq$ 500 ppm shall take place in the 18,878 square foot, steel-lined High Level Shop or within steel pans in the Low Level Shop. Equipment containing < 500 ppm PCB liquid or any concentration of non-liquid PCBs may be disassembled and decontaminated anywhere within the 59,078 square foot, curbed and lined area of the building.

2. The AW system rotary wash unit and wash rack may be used for decontaminating metal surfaces derived from drained PCB-contaminated articles (i.e., metal surfaces previously in contact with liquids containing PCBs at concentrations between 50 - 499 ppm) and shall not be used to decontaminate metal surfaces derived from PCB articles (i.e., metal surfaces previously in contact with liquids containing PCBs at concentrations $\geq$ 500 ppm.

3. When disassembling PCB equipment or articles that may contain residual liquids, TCI shall use absorbent pads, dry granular absorbent or other means, as appropriate, to minimize incidental spills to the floor of the storage and processing areas.

B. Allowable PCB Limits

1. The surfaces of components from items contaminated by PCBs and cleaned by the SW or AW processes shall not have a residual PCB concentration greater than that shown below. Analytical data shall be available to demonstrate that the residual PCB levels do not exceed that in the given requirements. If analytical data is not available, the components must be considered PCB items. For compliance purposes, limits for the materials indicated shall be as follows:

   a. Surface contamination based on wipe sampling and extraction of gauze wipe pads(s):

      $\leq$10 µg/100 cm^2 - acceptable for unrestricted use;

      <100 µg/100 cm^2 - acceptable for disposal in a 40 CFR §761.72(b) compliant smelter.

   b. Irregular surfaces and wire nuggets based on extraction of metal(s) sample:

      $\leq$ 2 ppm - acceptable for unrestricted use;

< 20 ppm - acceptable for disposal in a 40 CFR §761.72(b) compliant smelter.

2. The solvent used in any SW cycle can be temporarily stored in designated tanks for reuse in other intermediate wash cycles or returned directly to the recovery system. Any solvent used as a final wash shall have a PCB concentration of < 50 ppm.

3. Spent solvent from TCI's SW/SD process shall be:

   a. disposed in an incinerator operating in compliance with 40 CFR §761.70;

   b. decontaminated in the SD recovery system to a PCB concentration of <50 ppm for reuse in TCI's SW decontamination process, subject to the limitations specified in this Approval; or

   c. decontaminated in the SD recovery system to a PCB concentration of < 2 ppm without further restrictions on disposal or use of the recovered solvent.

4. Process water from the AW system shall be disposed of in accordance with 40 CFR §761.60(a) or §761.79(b)(1).

C. Sampling

To ensure that recoverable metal components have been cleaned to or below the required standard, the appropriate sampling protocol (wipe sample or grab sample) given in Appendix A to this authorization shall be followed and these procedures shall be considered part of the Conditions of this Approval.

D. Analysis

The PCB levels determined for liquid, solid and wipe samples shall be reported as total PCBs calculated by comparison to the relevant Aroclor standards -- i.e., Aroclor 1242, 1248, 1254 and 1260, etc. The analyses of all samples will be in accordance with the methodologies specified in 40 CFR §761.60(g).

E. Final Processing Quality Control

1. The determination of the efficacy of the metal cleaning process for wire and sheet metal components requires analysis of representative, composite wipe samples collected in accordance with Appendix A from every basket or batch processed through the SW or AW cleaning systems. If the concentration or mean concentration, as determined in accordance with Appendix A, of the metal wipe samples taken from any basket or batch exceeds the maximum limit(s) established in Approval Condition IV.B.1.a, then all metal in the basket or batch will be reprocessed and resampled.

2. Composited wipe samples will also be taken from specific locations on the internal surfaces of individual or randomly selected tanks from processed electrical equipment as more fully described in Appendix A. If PCBs are detected exceeding the maximum limits established in Approval Condition IV. B.1.a, then the entire batch of tanks will be reprocessed and resampled.

3. The determination of the efficacy of the metal cleaning process for irregular (metal) surfaces and wire nuggets requires analysis of composite grab samples collected in accordance with Appendix A from each basket or batch of processed metal. If the mean concentration of the metal samples taken from any basket or batch exceeds the maximum limit established in Approval Condition IV.B.1.b, then all metal in the basket or batch will be reprocessed and resampled.

F. Disposal

1. The disposal of all metal components of a PCB item shall be considered complete only after it has been determined that the residual PCB levels remaining on the "cleaned" surfaces do not exceed the applicable, unrestricted use PCB limits in Approval Condition IV.B.1.

2. All metal components of a PCB item whose "cleaned" surfaces exceed the applicable, unrestricted use PCB limits in Approval Condition IV.B.1, shall be reprocessed to meet the applicable, unrestricted use PCB limits or disposed of in accordance with the requirements of 40 CFR 761 Subpart D.

3. Drained dielectric fluid, containing PCBs at concentrations of 50 ppm or greater, shall be disposed of in a TSCA approved disposal facility, or in the case of drained dielectric fluid which is below 50 ppm PCBs and not as a result of dilution, it may be disposed of as used oil consistent with 40 CFR §761.20(e).

4. All non-recoverable residues generated from dismantling PCB and PCB-contaminated equipment shall be disposed of in a TSCA approved disposal facility. Non-recoverable residues generated from processing large PCB capacitors shall be disposed of in a TSCA approved incinerator. Non-recoverable residuals derived from or meeting the definition of PCB bulk product waste as defined in 40 CFR §761.3, shall be disposed of in accordance with 40 CFR §761.62.

5. No off-site movement of spent or recovered solvent, or still bottoms from the recovery of spent solvent with a concentration of $\geq$ 2 ppm PCBs shall be allowed except for purposes of disposal in a TSCA approved incinerator. Spent solvents or still bottoms from the recovery of spent solvents that are hazardous wastes as identified in 40 CFR Part 261 must also be managed in accordance with the requirements of the Resource Conservation and Recovery Act.

FIGURE 1 - FACILITY MAP

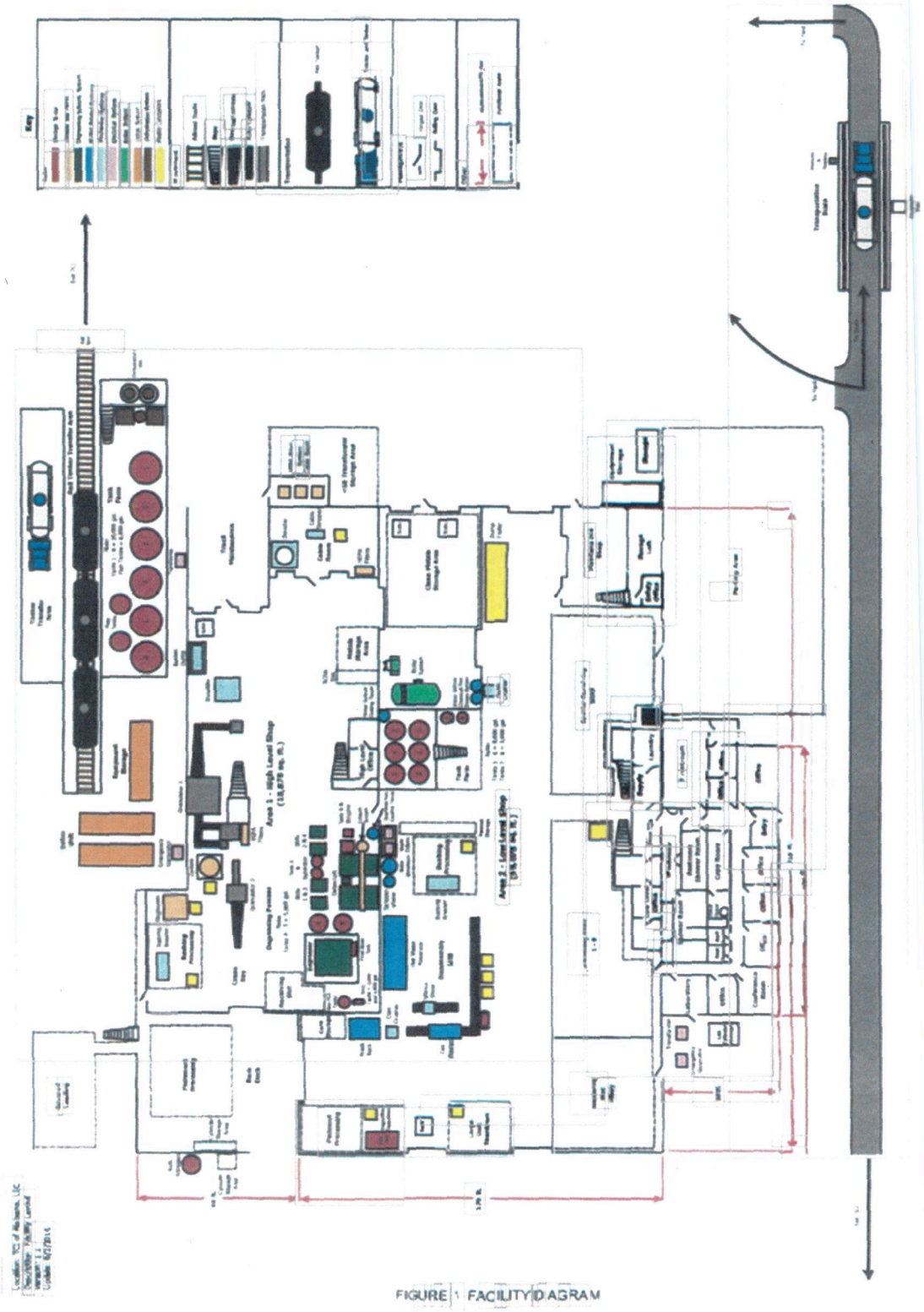

FIGURE 1 FACILITY DIAGRAM

FIGURE 2 – SAMPLE PCB STORAGE AREA STAGING