

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

TSimons:tgs/OTS-EED-CRB/07-18-90/TS-798/382-3992/Rm.NE118/Disk#5:B:CHEMPRO.N&M

JUL 20 1990

Mr. Robert A. Ream
 Director of Operations
 Unison Transformer Services, Inc.
 1338 Hundred Oaks Dr.
 Charlotte, NC 28217


Dear Mr. Ream:

This is in response to your letter of July 2, 1990 requesting confirmation of your understanding of the PCB regulations. In particular, whether the PCB rules allow for the reuse of containers (drums, tank trucks, and tank cars) for PCB disposal activities without decontamination between uses.

The PCB regulations do allow for the reuse of containers for disposal activities without decontamination between uses. It is important to note, however, that the containers would have to be decontaminated, in certain cases, in order to avoid dilution of PCB material, and in other cases, to avoid further PCB contamination. For example, if the containers originally contained PCBs at concentrations above 500 ppm, were emptied, and then transported to another site with the intent of refilling them with PCBs at less than 500 ppm, the containers would have to be decontaminated to avoid classifying this material as greater than 500 ppm.

If you have any further questions or comments, please feel free to contact Tom Simons of my staff at 202-382-3992.

Sincerely,



for Tony Baney, Chief
 Chemical Regulation Branch

cc: PCB Coordinators Regions I-X

Sent out 7/20 per [signature]

CONCURRENCES							
SYMBOL	TS-798	TS-798					
SURNAME	Simons	Baney					
DATE	7/19/90	7/20/90					