



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP - 6 2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Dana S. Myers
SD Myers
180 South Avenue
Tallmadge, OH 44278

Dear Mr. Myers:

This letter is in response to your letter of May 15, 2000, concerning the import of metals contaminated with Polychlorinated Biphenyls (PCBs) and the equivalency of parts per million (ppm) and wipe areas. Specifically, you wished to know whether the Environmental Protection Agency (EPA) would consider metals, cleaned to surface levels $<10 \mu\text{g}/100 \text{ cm}^2$ to be equivalent to $<2 \text{ ppm}$ PCBs for purposes of import under 40 CFR Part 761. You provided some data with your letter that indicates that, based on weight to weight measurements of PCBs to transformer metals, $10 \mu\text{g}/100 \text{ cm}^2$ can be equated to 0.5 ppm PCB.

EPA believes that parts per million (a volumetric concentration) cannot be equated with wipe samples showing measurements of micrograms per 100 square centimeters (a surface concentration) either analytically or mathematically. The two analytical measurements serve different purposes. Wipe samples are limited to demonstrating the level of contamination on impervious or non-porous surfaces (height and width) and generally require non-invasive sampling techniques. Bulk measurements (ppm) can be applied to almost any media (porous or not); the results indicate the level of contamination throughout the media sampled (height, width and depth), not just at the surface and can require the use of invasive or destructive sampling techniques.

As you note, EPA has established regulatory controls that apply equally to a surface area concentration of $10 \mu\text{g}/100 \text{ cm}^2$ PCBs and to a bulk concentration of 50 ppm PCBs for certain situations where a volumetric analysis cannot be performed. However, this does not mean that EPA found these levels to be equivalent in the sense of their level of contamination. Similarly, there is no scientific basis for equating a surface concentration of $10 \mu\text{g}/100 \text{ cm}^2$ PCBs with the import threshold of 2 ppm PCBs. In light of this, it would be inappropriate for EPA to establish a regulatory equivalency between $10 \mu\text{g}/100 \text{ cm}^2$ and 2 ppm PCBs for purposes of import for disposal.

Should you have further questions concerning the import of PCBs, please contact Peter Gimlin of my staff at (202) 260-3972. For additional questions regarding the issue of surface vs. volumetric measurement, contact Laura Casey at (202) 260-1346.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Melone". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

John W. Melone, Director
National Program Chemicals Division