

Application No.	Applicant	Renewal of an Exemption	Application No.	Applicant	Renewal of an Exemption	Application No.	Applicant	Renewal of an Exemption
7584-X	Eastern Mediterranean (Containers) Co., Ltd., London, England	7584	7630-X	Orval Tank Containers, Paris, France	7630	7597-P	United Reed Co., Banks, La.	7597
7584-X	Orval Tank Containers, Paris, France	7584	7593-X	Orval Tank Containers, Paris, France	7593	7614-P	Eurotainer, Paris, France	7614
7584-X	Interco Chemicals Ltd., Bedfordshire, England	7584	7625-X	A/S Cheminova, Lemvig, Denmark	7625	7607-P	Thompson-Hayward Chemical Co., San Antonio, Tex.	7607
7590-X	Puerto Rico Marine Management, Inc., Elizabeth, N.J.	7590	4108-P	C & C Oxygen Co., Chattanooga, Tenn.	4108	7597-P	Miro Chemical Co., Waukegan, La.	7597
7611-X	Richford, Inc., Elizabeth, Va.	7611	4487-P	Phillips, Edd, Okla.	4487	7597-P	Cleveland Chemical Co., Cleveland, Miss.	7597
7618-X	Missouri Pacific Railroad Co., St. Louis, Mo.	7618	6193-P	Mobil Chemical Co., Beaumont, Tex.	6193	7633-P	Orval Tank Containers, Paris, France	7633
7621-X	Great Lakes Chemical Corp., El Dorado, Ark.	7621	5520-P	Amchem Products, Inc., Anaheim, Calif.	5520	7654-P	Kodak Kodak Co.	7654
7632-X	Enterprise Service Co., Houston, Tex.	7632	6234-P	Chem Lab Products Inc., Anaheim, Calif.	6234			
7633-X	Sea Containers, London, England	7633	6348-P	Albright Industries, Inc., Charlotte, N.C.	6348			
7671-X	Sea Containers, London, England	7671	6814-P	J.M. Brothers Chemical Co., City of Industry, Calif.	6814			
7690-X	Procter Products Co., St. Paul, Minn.	7690	6841-P	Olin Chemicals Group, Stamford, Conn.	6841			
7714-X	Suttons International Limited, London, England	7714	6858-P	Orval Tank Containers, Paris, France	6858			
7719-X	Turner Co., Syracuse, N.Y.	7719	7652-P	Beech Aircraft Corp., Wichita, Kans.	7652			
7725-X	Economics Laboratory, Inc., St. Paul, Minn.	7725	7694-P	Robm and Rias Co., Philadelphia, Pa.	7694			
7752-X	Eurotainer, Paris, France	7752	7754-P	Compagnie Des Containers, Boulogne, Paris, France	7754			
7753-X	Stauder Chemical Co., Westport, Conn.	7753	7662-P	Woolfolk Chemical Works, Inc., Fort Valley, Ga.	7662			
7770-X	Ugine Kuhlmann of America, Inc., Paramus, N.Y.	7770	7597-P	Apollo Enterprises, Inc., Alhambra, Ark.	7597			
7820-X	Permal International, Inc., New York, N.Y.	7820						

This notice of receipt of applications for renewal of exemptions and for entry to an exemption is published in accordance with section 107 of the Hazardous Materials Transportation Act (49 CFR 1800; 49 CFR 1.53(e)).

Issued in Washington, D.C., on May 4, 1978.

J. R. GROTHE,
Chief, Exemptions Branch,
Office of Hazardous Materials
Operations.

ENVIRONMENTAL PROTECTION AGENCY IMPLEMENTATION PLAN FOR THE PCB MARKING AND DISPOSAL REGULATION: DRAFT FACILITY APPROVAL PROCESS

Introduction

Implementation of the PCB Marking and Disposal Regulation can be separated into two major segments: (1) the site approval process and (2) the surveillance and enforcement process. This Plan addresses only the former process. (A draft of the surveillance and enforcement strategy for the PCB Marking and Disposal Regulation was distributed to the Regions in Dallas at the PCB Implementation Meeting for their review and information).

The Office of Solid Waste, Hazardous Waste Management Division, has been asked to develop an approach to implement the site approval process and to provide technical support and guidance to the Regions in evaluating requests for the approval of PCB disposal facilities. In this regard, since implementation is basically a regional responsibility, it will be necessary for the Regional Administrators to appoint a Regional PCB Site Approval Coordinator who will organize response to requests for site approval. Site evaluation will be largely a technical activity; to provide technical support and guidance to the Regional Administrators in their decision making, a combined Headquarters/Laboratory Technical Support Team (TST) has been formed and will be available to the Regions if needed. However, it is intended that the TST will cease to function as the Regions build the needed technical experience base within house. Regional/Headquarters primary contacts for coordination will be the appointed Regional PCB Site Approval Coordinator and the Chairman of the Technical Support Team (Matt Straus, Office of Solid Waste).

The most important aspect of the regulation is the fact that sixty (60) days after promulgation of the regulation disposal becomes illegal except at EPA approved sites. It thus becomes imperative that evaluation and approval of such sites be made as soon as possible to minimize disruption of the normal flow of commerce and disposal of these wastes and avoid storage of large stockpiles of PCBs. The remainder of this paper lays out a plan to accomplish this.

Relationship to RCRA

Those facilities which will require approval under the PCB Marking and Disposal Regulation are the same as those facilities which will require permits under the Resource Conservation and Recovery Act of 1976 (RCRA), except that RCRA will significantly increase the quantity of wastes that are controlled, as defined in Section 3001 of RCRA, and increase the requirements (i.e., financial responsibility, contingency plans, etc.) imposed on these facilities. (Please note that RCRA will not affect the specific criteria cited in the PCB Marking and Disposal Regulation.) An argument might be made then, that the Regions should adopt the basic RCRA procedures for both site approval and surveillance and enforcement. However, the Office of Solid Waste does not think this is practical because:

(1) The RCRA procedures have not yet been proposed in the Federal Register, or, in many cases, developed as yet; actual RCRA implementation will not begin until FY 79.

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(2) The RCRA procedures are quite formalized and will take significantly more time and effort than can be spared, given the need to approve facilities as soon as possible.

Therefore, a streamlined set of procedures must be developed to provide for evaluation of those facilities likely to seek approval on short notice. If a mistake is made in an effort to expedite this approval, the site will be re-evaluated in more detail, when RCRA is implemented (a year or so later).

To prevent needless duplication, it seems expeditious to fold consideration of the site approval process of the PCB Marking and Disposal Regulation into the whole RCRA implementation process once the latter is instituted. Thus, the Office of Solid Waste believes that a separate permitting system for PCB disposal is needed only during this interim period to handle the initial site approval applications.

Facility Approval Process

The main problem in designing this process is the need to evaluate and grant approvals as soon as possible, due to the fact that sixty (60) days after promulgation of the regulation disposal of most PCBs becomes illegal except at EPA approved sites. In addition, the storage criteria specified in the regulation does not become effective until July 1, 1978, thus the alternative to disposal for up to four months is storage with no special requirements. Therefore, it is suggested that the Regional Administrator's first action should be to mail letters to those disposal facilities which might require approval under this regulation to notify them of their responsibilities. This letter should be sent by registered mail as soon as the administrator has signed the PCB Marking and Disposal Regulation. The notification letter should first be sent to those facilities identified on the recently generated list of PCB waste disposers, with a second set of notification letters going to other hazardous waste facilities which the Region has identified (see latest edition of "Hazardous Waste Management Facilities in the U.S." for the complete list; EPA/530/SW-146.3, January 1977).

The Agency's first contact is then likely to be by phone or letter from a facility owner/operator who desires approval. Regardless of who receives these contacts, they should all be funneled through the appointed Regional PCB Site Approval Coordinator. A checklist will be provided from Headquarters which would enable the Site Approval Coordinator to determine over the telephone some basic information such as:

1. Facility contact (name)
2. Address and location
3. PCBs currently handled
 - ▶ types and sources of PCBs
 - ▶ amount (total and rate)
 - ▶ how long (since when)
 - ▶ how managed (landfilled, landspread, road oiled, incinerated, treated, etc.)
4. Approval sought
 - ▶ types and sources of PCBs—capacitors, etc.)
 - ▶ total amount and rate
 - ▶ any stored (how much, etc.)
 - ▶ management techniques (same as above)

5. Have any State permits or approvals been received for the facility? For PCBs specifically?

The Regional PCB Site Approval Coordinator should then discuss with the applicant the formal technical report which is required in 761.40(d)(1) or 761.41(c)(1). Copies of the PCB Marking and Disposal Regulation should be sent if necessary.

To save time, where facilities currently receiving PCBs are involved, the Regional PCB Site Approval Coordinator should proceed to contact other Offices within the EPA Regional Office as well as other Federal Offices to gather any additional information and data on the facility which the Agency(s) may have. For new facilities or facilities which are not currently disposing of PCBs, where time is not so pressing, these offices can be contacted after receipt of the technical report. A similar call should be made to the appropriate State Agency. The purpose again would be to gather data and information relative to the site. If the facility claims to have a State permit which covers PCBs, the issuing State Agency should be asked if they are willing to certify in writing that the facility meets all the EPA standards which are identified in Annex I or II of the regulation. (It is suggested that the Regional PCB Site Approval Coordinator contact the States as soon as possible to discuss the State's role with regard to approval. In addition, a copy of the PCB Marking and Disposal Regulation should be sent to each State as soon as it is signed by the Administrator.)

It should be noted that unlike other Federal legislation, the Toxic Substances Control Act does not authorize the Administrator to delegate his authority outside the Agency to carry out any parts of the Act or any requirements prescribed in any subsequent regulations unless the Administrator is unable or is not likely to take action against a chemical substance or mixture under this Act for their prevention or elimination. Therefore, facilities which currently hold a State permit to dispose of PCBs would still require approval from the Federal EPA to dispose of PCBs. However, nothing in the Toxic Substances Control Act will affect the authority of any State or political subdivision of a State to establish or continue in effect any regulation unless the State's authority provides a lesser degree of protection than afforded by the Toxic Substances Control Act or any subsequent regulations. For example, if the State or political subdivision provides the same or a higher degree of protection for PCBs than the requirements under the PCB Marking and Disposal Regulation, the State's standards will remain in effect and not be pre-empted by the Federal standards.

If the State is willing to certify the disposal facility or if the State submits information to the Regional Administrator which shows that operation of the disposal site will not present an unreasonable risk of injury to health or the environment from PCBs, when one or more of the requirements described in Subparts 761.40(a) and (b) or 761.41(b) are not met, then a decision must be made on whether a certification from that particular State obviates the need for any further EPA investigation. The opinion of the Regional Solid Waste Staff should weigh heavily in this decision since they have monitored and assisted the development of the State Solid Waste Programs and know intimately the quality of these programs. Where an incineration facility is involved, the Regional PCB Site Approval Coordinator should confirm that the facility has conducted a trial burn or has monitoring data for incinerating PCBs prior to accepting the State's certification of the site. (A copy of all such monitoring data should be secured from the State.)

If the decision is to accept the State's certification, then after receipt of the technical report from the facility owner/operator, the Regional Administrator should issue a letter of approval to the facility which should indicate that revocation of approval is possible for violation of the standards, and that this approval will be reconsidered as part of the RCRA permit process. (The Regional PCB Site Approval Coordinator must confirm that the facility owner/operator had notified the State and any political subdivision of the

facility's desire to dispose of PCBs at least 30 days before the approval can be granted.) Granting approval by accepting State certification should take approximately four (4) weeks, provided the technical report is forthcoming.

Assuming that an EPA evaluation is needed, the next step involves an analysis by the Regional Staff as to whether sufficient information exists from the technical report and other sources to proceed. Another checklist will be developed by Headquarters to aid in comparing the available data with the PCB standards. Different checklists for incinerators and land disposal facilities will be developed by Headquarters based on the requirements of 761.40 and 761.41. Another checklist based on the storage requirements of 761.42 will also be developed since the adequacy of on-site storage should be considered before granting approval. If more data and information is needed, the Regional PCB Site Approval Coordinator should take the necessary steps to obtain it from one or more of the following:

- (1) the applicant
- (2) the State or other Federal Agencies
- (3) by visit

At this point, the Regional Administrator and his staff should decide whether the Headquarters/Laboratory Technical Support Team (TST) should be requested. (The PCB Site Approval Coordinator should evaluate the areas of expertise of Regional personnel to assist the Regional Administrator in making this decision.) If so, the Regional PCB Site Approval Coordinator should phone the Chairman of the TST, and arrange for the TST to conduct the evaluation. The Regional Coordinator will make arrangements for the TST to visit the site with others (e.g., State and local officials, etc.), as may be appropriate, and will assist the TST (along with other Regional personnel) as may be appropriate. The TST will prepare an evaluation report for the Regional Administrator with recommendations on the suitability of the disposal site. The evaluation and preparation of the report should normally take about six weeks. If it is not thought necessary to activate the TST, the Regional team will proceed directly to do the site evaluation. It may be necessary for the applicant to gather data which may take additional time, e.g., geology and groundwater information. Approval should not be granted until data exists to compare all facility characteristics with the regulation requirements unless the missing data can be considered immaterial to a decision on public health and environmental acceptability. If an emergency situation should occur (i.e., PCB spill), the EPA On-Scene Coordinator should contact the Regional PCB Site Approval Coordinator as soon as possible to assess the situation and determine what possible action should be taken to minimize any danger to public health and environmental damage. (See Section 761.10 (c) of the Regulation for details on spills.)

Public Participation

A decision must be made concerning public comment/involvement on the granting of approval. As previously discussed, for facilities now handling PCBs, it is imperative that approvals (or denial) be granted as soon as possible to prevent the dangerous buildup on backlogs of waste. Thus, a formal hearing procedure is probably precluded for these facilities. However, written comments should be accepted by the Regional Staff during a 30 day comment period during which the technical evaluation is being conducted. A 30 day comment period should be allowed for all facility evaluations including those in which the State certifies the site. Notice of opportunity for written comments should be sent to the Regional Intergovernmental and Congressional

Assistants (RICAs), placed in the Post Office, and in public places of the municipality nearest the premises. (The Regional Public Affairs Staff is probably best able to handle this.) The applicant's technical report should also be made available to the public at both the EPA Regional Office and at a location near the disposal facility. If the disposal facility asserts a claim of confidentiality covering all or part of the information in the application, the information covered by the claim will be disclosed by EPA only to the extent, and by means of the procedures set forth in 40 CFR Part 2, Subpart B (41 *Federal Register* 36906, September 1, 1976). In addition, the PCB Marking and Disposal Regulation requires that the facility owner/operator provide written notice to the State and local government(s) at least 30 days before a facility is used for the disposal of PCBs.

For new facilities or facilities not yet handling PCBs, the luxury of more time exists, since delays will not interrupt the normal flow of commerce and disposal of these wastes. In these cases, the Regional Administrator could provide, in addition to the above, the opportunity for a public hearing if sufficient interest is shown during the comment period. Such a hearing might be desirable if the approval is likely to be controversial, particularly if litigation is likely to result.

Final Approval

Once all necessary information has been received, public input has been evaluated, and the technical evaluation is completed, the decision to approve must be made (where incinerators are involved, a test burn may be required by the Regional Administrator). This is to be based largely on whether or not the facility location and design meet the U.S. EPA regulatory criteria, however, other factors will need to be considered in reaching a final decision. (The Regional Administrator does not have the authority to withhold approval of a PCB disposal site on the sole basis that the site does not have State and/or local approval or does not meet the more stringent State or local standards.) Where the facility does not meet all the regulatory criteria, decisions must be made as to whether the variations of the requirements constitutes a lessening in the degree of protection provided. In some cases, mitigating circumstances of design characteristics may eliminate the need to meet all standards. In these cases, the Regional Administrator may waive specific requirements. The approval letter will discuss:

- (1) any waivers and why waivers were granted,
- (2) any conditions which are placed on approval,
- (3) a statement to the effect that approval will be reconsidered as part of the RCRA permit process, and
- (4) agreement to allow access for purposes of sampling and inspection.

Denial will indicate the reasons and suggestions as to what must be done by the applicant before approval can be granted.

Where incineration is concerned, a trial burn may be required if prior data is not available. Section 761.40(d)(2) sets out the requirements for this, including submittal of a trial burn plan by the applicant. This should be submitted as part of the technical report which is required as part of the application. Regional Staff (and/or the TST) will review the trial burn plan after favorable review of the rest of the evaluation. The test burn then, will be the rest of the evaluation. The test burn then, will be the last action prior to facility approval. Regional (and/or TST) response to the plan may include conditions to be met in conducting the tests. Results of the tests will, of course, determine whether the application is approved.

Resource Estimates

Currently, we anticipate that between 20 to 30 facilities will apply to the ten (10) Regional Administrators for approval to dispose of PCBs. It is estimated that for each facility that applies for approval, each Region will employ between 1 man-week to 25 man-weeks to conduct the evaluation and approve or disapprove the disposal facility. The exact level of resources will vary depending upon several factors, some of which are:

- (1) type of facility
- (2) whether TST is requested to conduct evaluation
- (3) whether State certified site, and
- (4) whether test burn is required by the Regional Administrator

Headquarters Laboratory Technical Support Team (TST)

Because of the short lead time prior to receipt of applications (March), there is insufficient time for Regional Staff to become intimately familiar with the more complex aspects of facility siting and design. For this reason, a combined Headquarters/Laboratory Technical Support Team (TST) has been formed from existing resources as a short lived means of supplying the necessary expertise. Its function will be to provide support and guidance to the Regions.

This guidance may take any of several forms, some of which are:

- (1) Conduct a complete site evaluation, including review of the technical report with recommendations to the Regional Administrator on the suitability of the site
- (2) Review trial burn plan and/or monitor trial burn at the incineration facility

(3) Provide expertise to the Region on individual subjects (i.e., hydrogeology, etc.) Activation of the TST will be by telephone request from the Regional PCB Site Approval Coordinator to the Chairman of the TST. (A letter from the Regional Administrator to the Chairman of the TST should follow.) The Regional PCB Site Approval Coordinator will handle all administrative aspects of approval and provide the logistical support (arranging meetings, etc.) for the TST.

Briefly, participants and their areas of expertise should include:

- Office of Solid Waste (Hazardous Waste Management Division)
 - Chairman of TST
 - Incineration design and operation
 - Chemical waste landfill design and operation
 - Office of Toxic Substances (Hazard Assessment, Chemical Control and Testing Divisions)
 - Regulation interpretation
 - Office of Research and Development (Monitoring and Technical Support Office, and Solid and Hazardous Waste Research Division)
 - Waste incineration technology
 - Hydrogeology expertise
 - Test methods analysis
 - Office of Air Quality Planning and Standards
 - Air pollution monitoring and control from incinerators
 - Office of Enforcement
 - Compliance and enforceability of approval conditions
- It is intended that the TST will no longer be needed as the Regions build the needed technical experience base within house. Further, the need for the TST will be eliminated as

the PCB site approval regulatory process is incorporated into the broader RCRA implementation process.

At the present time, we anticipate that between 10 and 30 trips will be necessary by the TST in assisting the Regions in evaluating these disposal facilities, however, the actual number of trips will largely depend on several factors:

- (1) Number of facilities applying for approval
 - (2) Region's ability to conduct site evaluation in-house
- If the TST is called upon by the Regions, it is estimated that approximately 4 man-days will be required for each individual who is a member of the TST to conduct one site evaluation. The actual number of TST members for each site evaluation will vary depending on the type of site, number of requests received by the Regions and travel limitations on TST members.

Manual of Sampling Methods and Analytical Procedures

This is required to be available under Sections 761.10 (e) (2) and 761.40 (d) (3), and is to include sampling methods and analytical procedures for: (1) sampling and analyzing the contamination levels associated with spills, (2) measuring and recording rate and quantity of PCB combustion, (3) incineration temperatures, and (4) monitoring of stack emissions. An initial draft of this manual has been prepared by the Office of Solid Waste which is a compilation of EPA standard test methods dealing with the above subject tests. This manual has been reviewed by various offices within the Agency and is expected to be issued as an interim document by mid-February. A final version of the manual is expected to be issued, after undergoing further review within the U.S. EPA, by early spring of 1978.

Approval Lead Time

Depending upon the type and location of the facility, the following estimates may be used by the Regions to estimate the approximate time it will take to approve PCB disposal sites:

- State Certification for disposal sites — 4 weeks
- Landfills and incinerators (no trial burn required; currently receiving PCBs) — 13 weeks
- Landfills not currently receiving PCBs (due to public hearings) — 17 weeks
- Incinerators (trial burn required) — 24 weeks. These estimates, of course, assume that the Agency will have the necessary staff available to perform the site evaluation and secondly, that the applicant has the necessary data in hand for review. If drilling or complex sampling/analysis or design work are necessary, the time required for this activity could extend the necessary lead time by up to 9 months.

REGIONAL PCB SITE APPROVAL COORDINATORS

- REGION I — Mr. Dan Moon, Solid Waste Program
 REGION II — Mr. Conrad Simon, Air and Hazardous Materials Div.
 REGION III — Mr. William Schremp, Solid Waste Program
 REGION IV — Mr. James Scarbrough, Solid Waste Section
 REGION V — Mr. Karl Klepitsch, Jr., Solid Waste Program
 REGION VI — Mr. Larry Brnicky, Solid Waste Program
 REGION VII — Mr. Morris Tucker, Solid Waste Section

REGION VIII — Dr. Henry Schroeder, Solid Waste Branch

REGION IX — Mr. James Channell, Hazardous Materials Branch

REGION X — Mr. Roger Fuentes, Solid Waste Program

Partial List of Disposal Facilities Which Currently Handle PCBs

Region I

General Electric — Incinerator
100 Woodlawn Ave.
Pittsfield, Mass 01201

Region II

Chemical Control Corp. — Incinerator
23 South Front St.
Elizabeth, N.J. 07201

(Company is currently in litigation and it is not clear whether they will be allowed to continue operating.)

Chem-trol Pollution Services, Inc. — Landfill

P.O. Box 200
1550 Balner Road
Model City, N.Y. 14107

Frontier Chemical Wastes Process, Inc. — Pyrolysis (Questionable)
4626 Royal Ave.

Niagara Falls, N.Y. 14303

NEWCO Chemical Waste Systems, Inc. — Incinerator, Landfill

Subsidiary of Niagara Recycling, Inc.
4626 Royal Ave

Niagara Falls, N.Y. 14303

Rollins Environmental Services — Incinerator
Bridgeport, N.J. (Logan Township)

Region III

NONE

Region IV

Resource Industries of Alabama, Inc. — Landfill (Questionable)

P.O. Box 1200
Livingston, Alabama

Region V

Earthline Corporation — Landfill
Wilsonville, Illinois

Land Reclamation Lmt'd.
2300 S. Green Bay Rd.
Racine, WI 53406

Metro Disposal Service
10712 124th Street
Franklin, WI 53132

Nuclear Engineering Co., Inc. — Landfill
P.O. Box 158

Sheffield, Illinois 61361

Waste Management, Inc.
9050 N. 124 St.
Milwaukee, WI 53223

Region VI

Clean Land Air Water (CLAW) — Landfill
Plaquemine, Louisiana

Energy Systems Co. (ENSCO) — Incinerator
El Dorado, Arkansas

Rollins Environmental Services — Incinerator
Baton Rouge, LA
Houston, Tx.

Sediment Removal Co. — Landfill
Plaquemine, LA

Southwest Ecologist Co. — Landfill
Baton Rouge, LA

Texas Ecologists, Inc. — Incinerator, Landfill
Robstown, Texas

Region VII

Big 3 Enterprises — Incinerator
10,000 E. Birmingham Rd.

Kansas City, MO

Bobs Home Service, Inc. — Landfill
Wright City, Missouri

Kansas Industrial Environmental Services — Landfill
Furley, Kansas

Wheeling Disposal Service Co., Inc — Landfill
Andrew County, MO

Region VIII

NONE

Region IX

Calabasas Landfill

Palos Verdes Landfill

(Contact: LA County Sanitation District
P.O. Box 4998

Whittier, CA 90607

Casmalia Disposal Site — Landfill
P.O. Box 5275

Santa Barbara, CA 93108

Chancellor and Ogden, Inc./BKK — Landfill
3031 East I St.

Wilmington, CA 90744

Fresno County Dept. of Public Works — Landfill
4459 East Kings Canyon Rd

Fresno, CA 93702

Hollister Disposal Site — Landfill
Hollister, CA 95203

Nuclear Engineering Co., Inc. — Landfill
Beatty, Nevada 89003

Omar Rendering Co. — Landfill
P.O. Box 1235

Chula Vista, CA

Pacific Reclamation and Disposal, Inc. — Landfill
P.O. Box 885

Benicia, CA 94510

Richmond Sanitary Service — Landfill
1224 Nevin Ave.

Richmond, CA

San Diego County Site — Landfill
5555 Overland Rd

San Diego, CA

Ventura Regional County Sanitation District — Landfill
P.O. Box AB

Ventura, CA

Region X

Chem-Nuclear Systems, Inc. — Landfill
Arlington, Oregon
Wor Con, Inc. — Burial
1 Box 546
400 Shoshonee Street South
Twin Falls, Idaho 83301

(List of sites was provided by Regional Solid Waste Management Staff).

PCB Disposal Facility Approval: Checklists

In evaluating requests for the approval of PCB disposal facilities, the Regional PCB Site Approval Coordinator will need to make several decisions throughout the site approval process. Attached are several checklists which can be used to assist the Regional Coordinator in making these determinations.

1) Initial Contact by Facility Owner/Operator Who Desires Approval

The Agency's first contact is likely to be by phone or letter from the facility owner/operator who desires approval. Regardless of who receives these contacts within the Region, they should all be funneled through the appointed Regional PCB Site Approval Coordinator. In this initial interview with the facility owner/operator, the Regional Coordinator may find it useful to use the following checklist to obtain some basic information which will (1) indicate whether the facility requires EPA approval and (2) assist the Regional PCB Approval Coordinator to prioritize the requests that are received.

Initial Interview Checklist

Name, address and phone number of company (include both headquarters and disposal site).

2. Individual making initial contact and phone number
3. Principal contact within company and phone number
4. PCBs currently handled

(a) types of PCBs currently handled (i.e., liquids, sludges, capacitors (whole or shredded), transformers, contaminated soils, etc.)

(b) source of PCBs currently handled (i.e., utilities, capacitor or transformer manufacturers, railroads, industry, etc.)

(c) estimate concentration and quantity for each type of PCB currently handled (total and rate) (Note: PCB mixture means any mixture, except municipal sewage treatment sludge, which contains 0.05 percent (500 ppm) on a dry weight basis or greater of a PCB chemical substance.)

(d) management techniques for each type of PCB waste currently handled (i.e., landfill, incineration, landspreading, storage, treatment, etc.)

(e) approximately how long has the company been handling PCBs.

5. Approval sought

(a) types of PCBs which will be handled (i.e., liquids, sludges, capacitors (whole or shredded), transformers, contaminated soils, etc.)

(b) source of PCBs which will be handled (i.e., utilities, capacitor or transformer manufacturers, railroads, industry, etc.)

(c) estimated concentration and quantity for each type of PCB which will be handled (total and rate)

(d) management technique for each type of PCB waste which will be handled (i.e., landfill, incineration, landspreading, storage, treatment, etc.)

(e) are PCBs currently being stored on-site; if yes, how are they being stored and how much of each type of PCB is being stored

6. Have any State or local permits or approvals been received for the facility? For PCBs specifically? If yes, which State or local Agency(s) issued the approval (principal contact from State or local Agency(s) and phone number).

2) Determination as to Whether Sufficient Information Exists in Technical Report

After receiving the facilities application (technical report) to dispose of PCBs and assuming that an EPA evaluation is to be conducted (State certification is not available or is not accepted by the Regional Administrator), the Regional PCB Site Approval Coordinator will need to conduct a cursory review of the report and determine whether sufficient information exists from the technical report and other sources with which to proceed. The following set of checklists should be used by the Regional PCB Site Approval Coordinator to assist him in making this determination:

1. The technical report that is submitted on incinerators should, at a minimum, contain the following information:

a. The technical report should describe the location of the incineration facility with respect to: (1) industrial sites (both manufacturing and commercial), (2) residential areas (3) navigable streams (i.e., rivers, lakes, etc.), and, (4) the nearest city, town or village.

b. The technical report should contain a detailed description of the incinerator including general site plans and design drawings. The description should include at a minimum:

— general description (i.e., rotary kiln, liquid injection, etc.) of the incinerator (indicate manufacturer)

— capacity of the incinerator (include the dimensions of the combustion chamber)

— type of feed mechanism into the combustion chamber

— type of auxiliary fuel used, if any, and method of feeding the auxiliary fuel into the combustion chamber

— stack height

— type of air pollution control (APC) equipment (i.e., high-energy venturi scrubber, electrostatic precipitator, afterburner, etc.)

— capacity of the APC equipment

— type of instrumentation on the APC equipment

— type of residues (i.e., bottom ash, scrubber effluent,

etc.) generated from incinerator and disposal techniques (i.e., sanitary landfill, etc.)

c. The technical report should contain any engineering data, test results or other information on the performance (anticipated or measured) of the incinerator when PCBs are destroyed. The report should include at a minimum:

— operating temperature of combustion chamber

— operating temperature of afterburner (if appropriate)

— dwell time of incinerator (at temperature)

— combustion efficiency

— mass emission rate (for incineration of non-liquid

PCBs)

— quality of stack gases

— quality of residues including scrubber effluent

d. The technical report should contain a description of the sampling and monitoring equipment used when PCBs are destroyed and facilities available. The report should include at a minimum:

— description of laboratory facilities on-site (if any)

— description and frequency of sampling and analytical procedures performed for PCB wastes (description and drawing of sampling train should be included)

— description of sampling station at the stack (i.e., portholes, platform, instrumentation)

— description of the monitoring equipment on the incinerator for the following:

- ▶ temperature
- ▶ flow rate of combustion air
- ▶ flow rate of PCBs being fed into the combustion chamber

▶ stack gases (i.e., O₂, CO, CO₂, NO_x, HCl, Total Chlorinated Organic Content, PCB Chemical substance, Total Particulate Matter, etc.)

— water pressure on wet scrubber

— description of the automatic shut-off system for the following:

▶ failure of the monitoring operations for combustion products and incineration operations

▶ failure of the PCB rate and quantity measuring and recording equipment

▶ when the combustion temperature, dwell time, and/or excess oxygen fall below specified criteria

▶ flame-out

▶ loss of water pressure in scrubber

▶ failure of feed mechanism into combustion chamber

e. The technical report should contain the estimated quantity for each type (i.e., liquids, sludges, capacitors (whole or shredded), transformers, contaminated soil, etc.) of PCB to be incinerated.

f. The technical report should include any State, local or Federal permits or approvals.

g. The technical report should include a description of the storage area.

h. The technical report should include a description of the recordkeeping and reporting procedures

i. The technical report should include a list of schedules and plans for complying with the approved requirements

— compliance schedule

(For any requirements outlined in Sections 761.40 (a) and (b) of the regulation which the facility owner/operator requests a waiver, a detailed discussion shall be included which describes the requirement(s) the facility owner/operator wants waived and the reason for requesting the waiver).

II. The technical report that is submitted on chemical waste landfills should, at a minimum, contain the following:

a. The technical report should describe the location of the landfill with respect to: (1) industrial sites (both manufacturing and commercial), (2) residential area, (3) navigable streams, (i.e., rivers, lakes, etc.) and (4) the nearest city, town or village.

b. The technical report should contain a detailed description of the chemical waste landfill including general site plans and design drawings. The description should, at a minimum, include:

— discussion of the general geologic profile of the site

— discussion of the general hydrologic profile of the site (should include the maximum/minimum groundwater levels)

— size of the landfill (capacity)

— approximate size of the trenches which will contain PCBs (include the dimensions of the trench)

— narrative discussion of the monitoring system — both location and construction (include a map indicating placement of the monitoring wells)

— description of type of leachate collection and treatment system (if applicable)

— description of the type of liner installed (if applicable)

— discussion of the security measures taken at the site (i.e., type of fencing surrounding the site, etc.)

— indication of the groundwater drinking sources in the immediate area

c. The technical report should contain any engineering reports or other information which describes the manner in which the landfill will comply with the requirements cited in Section 761.41 (b) of the regulations. At a minimum, the report should include:

— in-place soil thickness or compacted soil liner thickness

— permeability

— per cent soil passing No. 200 sieve

— liquid limit

— plasticity index

— artificial liner thickness (if applicable)

— distance from bottom of landfill to the maximum groundwater level

— relative location of landfill to the 100-year floodwater elevation

d. The technical report should contain a description of the sampling and monitoring equipment when PCBs are landfilled and facilities available. The report should include at a minimum:

— description of laboratory facilities on-site (if any)

— baseline analysis of the ground and surface water from the disposal site area

— description and frequency of sampling and analytical procedures performed for PCB wastes (at a minimum, the following parameters shall be analyzed: PCBs, pH, specific conductance and chlorinated organics)

e. The technical report should contain the estimated quantity for each type (i.e., liquids, sludges, capacitors (whole or shredded), transformers, contaminated soils, etc.) of PCB to be landfilled.

f. The technical report should provide a general description of waste materials other than PCBs that are expected to be disposed of in the landfill. The report should also indicate those wastes that are expected to be placed in the same trench with PCBs in the landfill.

g. The technical report should include an operations plan for the chemical waste landfill. In addition to the factors listed in Section 761.41 (b) (7) (ii) and (iii) of the regulations, the operations plan should also include the following:

— procedure for handling surface water run-off from landfill

— method for handling PCB wastes (i.e., drummed, whole capacitors, etc.) and method for placing PCBs in landfill

— discussion of covering procedures and type of final cover

— approximate schedule for working the landfill

h. The technical report should include any State, local or Federal permits or approvals

i. The technical report should include a description of the storage area.

j. The technical report should include a list of schedules and plans for complying with the approved requirements

— compliance schedule

(For any requirement which is outlined in Section 761.41 (b) of the regulation which the facility owner/operator requests a waiver, a detailed discussion shall be included which describes the requirement(s) the facility owner/operator wants waived and the reason for requesting the waiver).

III. The technical report which is required to be submitted by the facility owner/operator under Sections 761.40 (d) (1)