CONFIDENTIAL

HANDLING OF A PCB SPILL

Some studies have shown that products containing Polychlorinated Biphenyls may be persistent, an environmental contaminant and, possibly, injurious to certain forms of bird, aquatic, and animal life. It is, therefore, extremely important that entry into the environment be avoided.

In the event of a spill, the clean-up can be accomplished without serious hazard to personnel if reasonable precautions are taken. These products are considered to be harmful substances if taken internally or if in prolonged contact with the skin. They cause irritation of skin and eyes. To avoid taking it internally, they should not eat or smoke or breathe the vapors, mist or fumes. If on the skin, wash product off thoroughly, with soap and water. If in the eyes, flush with water.

The procedure for handling of a spill will vary, dependent on the conditions. The following summary covers only some of the actions with the understanding that those directing the work exercise responsible judgment and take any other indicated desirable actions.

When a call is received at any office or plant, the person receiving the call must record and verify with the caller:

1. The name of the caller
2. The official title and function of the caller (such as truck driver or police officer).
3. All the information available concerning the accident such as:
   a. Exact location (in sufficient detail to find the site on maps and on the ground).
   b. Time of occurance (as close as possible)
   c. Name of transportation company
   d. Product name
   e. Amount of product involved (if known)
   f. Condition of the transportation equipment
   g. Who else has been informed (list name and title)
   h. Disposition of casualties, if any (what hospital, clinic or physician)
4. How to contact the caller or other responsible party at or near the scene.
5. Whether the nearest law enforcement agency has been informed. If not, the caller should do so immediately.

The receiver of the call should immediately inform the proper responsible people in his company. This may include, among

others, people who are experts in manufacturing, medicine, safety, pollution abatement, transportation, and public relations.

A responsible person should immediately contact the accident site and determine what information is needed there and see that it is provided. In addition, the State Pollution Control agency, transportation company, law enforcement agency, and any others who have a need to know should be informed promptly.

The clean up operation should commence as soon as possible. Included in these operations should be the following:

1. Limit the amount that escapes from the container. This could include, among other things, righting the container (tank car or drums), closing valves, plugging a hole with a wooden peg or other actions.
2. Limit the spread of the product. It may be necessary to obtain a bulldozer, back hoe, or other equipment and build a dam to contain the product. The equipment may be obtained from a local contractor if the transportation company does not have it readily available.
3. Transfer the remainder of the product to another container if necessary to avoid further leakage.

4. Keep the product out of streams, lakes, impoundments, or any other surface or sub-surface water. If it enters any of these, determine if it has collected at a low point and pump it out of the water if possible. Be sure that the proper authorities are informed immediately so they can notify anyone who could be affected by the water pollution.
5. If there are shallow wells in the surrounding area, sample the water from the wells and analyze for PCB's. If any are found, continue to sample until none are found. Be sure the water from a contaminated well is not taken internally.
6. Dig up any contaminated earth and have it hauled to an area approved for the disposal of PCB's.
7. Decontaminate any equipment used in the clean up operation or dispose of it in a manner which prevents it entering the environment.
8. If other freight is contaminated, be sure it is quarantined until disposition can be determined. It must be decontaminated or disposed of in a responsible manner.
9. Transportation equipment must be thoroughly cleaned before it can be used for other purposes. The cleaning of the equipment must not be allowed to contaminate sewers, streams or other areas not approved for disposal of PCB's.