

APPENDIX D

FACILITY OPERATING PLAN

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D.1 FACILITY OPERATIONS

D.1.1 Storage Period

The storage of PCBs and PCB Items is limited to one year from the date upon which the material was removed from service, determined to be a PCB waste, and a decision was made to dispose of it. Additionally, storage time limit extensions may be sought from the EPA and granted in accordance with 40 CFR 761.65(a). Should storage time limit extensions be sought and/or granted, Veolia will ensure that the proper records are retained in accordance with its records and reporting program and 40 CFR 761.65(a)(4). PCB Materials received by Veolia greater than 9 months from the Out of Service Date are not included in the one year storage limitations. If PCB's or PCB Items are received 9 months or greater from the Out of Service Date, Veolia will notify Region IX in writing of the type of PCB Material, Generator, document numbers, and the date of destruction.

Veolia requires generators to mark its PCB items and manifest prior to shipment with the date upon which the item was removed from service for disposal. If marking is not visible, Veolia will contact the generator to establish the correct service removal date. PCB contaminated waste or liquid PCB waste, when composited, will retain the date of the oldest container.

D.1.2 Waste Acceptance Procedures

Prior to shipping waste materials, generators are required to provide information to Veolia regarding the type, quantity, regulatory status of their waste, and analytical as required. From this information a Waste Profile is established for the material.

Upon arrival of each shipment of materials at the facility, the shipping papers (manifests for PCB wastes) are verified against the waste profile. Following verification of the shipping papers the materials are off-loading from the transport vehicle and staged for inspection, a receiving report is generated, and labels are prepared for the containers. Each container is then subjected to an initial visual inspection and weighed. The initial inspection is intended to verify that the container actually contains the waste listed on the waste profile and does not contain any obvious signs of other wastes. Following completion of the receiving report, all the paperwork for the shipment is given to a receiving clerk who inputs the information into our waste tracking system. A unique identification number is generated for each container. The containers are labeled and moved to the proper storage location.

Analytical is not required for ballasts; however, only ballasts clearly labeled “no PCBs” may be profiled into the facility as such. All other ballasts are assumed to be PCB-containing unless they are clearly identifiable as non PCB by date or type. Veolia performs 100% visual confirmation on incoming materials as part of its waste acceptance procedure.

Any equipment that arrives at the site and is found to be leaking is immediately contained or over-packed. If leaking ballasts are discovered during or after the receiving process, the leaking ballasts are placed into storage for disposal via incineration. A notation to the effect that a drum or container was sent for direct incineration is made within the facility operating record.

D.1.3 Storage Procedures

It is Veolia’s policy to store PCB and PCB-contaminated items within containment areas upon receipt at the facility. In addition, bulk PCB remediation waste or PCB bulk product waste that may be generated in response to a spill event or at the time of closure will be managed in accordance with the protocols established at §761.65(c)(9) or will be containerized and stored in accordance with standard operating protocols.

Following the implementation of waste acceptance procedures, PCB and PCB-contaminated items are moved into Building 2 or Building 3 for storage. All incoming TSCA materials are barcoded. Barcoding assists in tracking materials throughout the facility and to the final disposal locations. Barcoding does not allow Veolia to perform a mass balance on materials due to differences in units of measures (i.e., some materials are tracked by weight, and others by volume depending on whether they are solid or liquid materials). Inventories are tracked manually and electronically.

D.1.3.1 Layout Building 2

Building 2 is the central receiving building, provides storage for PCB and non-PCB items, and is also a non-PCB processing area.

The former PCB processing area has been cleaned, the tables, pod, decontamination tanks and any equipment was either relocated to Building 3 or has been disposed of.

D.1.3.2 Layout Building 3

Building 3 houses PCB storage and processing activities.

The PCB equipment processing and storage area is surrounded by a curb with a six-inch minimum height and railings along the walk ways. The floor is sealed where direct storage of drums, containers, or other equipment may occur; however, steel containment pans may also be

used within this area. This area contains the PCB and PCB-contaminated equipment disassembly, drainage, and decontamination processes. There will be no PCB product from the process stored outside of Building 3 except when solids and debris are transferred to a bulk roll off container designated for off-site disposal. The area is designed to minimize the potential for migration of PCB laden material throughout the other areas of the facility. Liquids/oils are packaged and stored for off-site shipment within Building 3.

The storage and processing area is isolated and has restricted access. Separate entrances and exits for the processing area have been constructed to ensure that all workers enter the area through designated points. The entrance points house all the required footwear PPE for the area as well as a place to don and doff the appropriate PPE.

Although PCB processing has been moved from Building 2 to Building 3, Veolia does not anticipate the need to commence closure of any portion of Building 2 as there will still be PCB storage activity in Building 2.

Berming, Coating, and Sealants for Building 3

Veolia has re-applied epoxy coatings to the floor. The existing floor is concrete and will not change. The existing curbing has been modified in accordance with 40 CFR 761.65 (b)(1)(ii) of the regulations to ensure it is at least 6-inches in height. In selecting a sealant, Veolia provided an MSDS for PCBs to the contractor such that the effectiveness of any proposed sealant(s) with regard to PCB penetration could be evaluated. An appropriate sealant was selected based on this information. The MSDSs for the sealant system have been included in Appendix G of this application¹. Construction joints and expansion caps were also sealed with the material identified above.

Tanks in Building 3

There is one bulk tank used on site. The tank is located in Building 3. The tank is a 650-gallon aboveground tank used in the process of decontaminating nonporous metals recovered from the dismantling of PCB contaminated items. The tank is open-topped and considered a “product” tank, and is not included in the facility storage capacity. Once the product is spent, it becomes liquid waste. Liquid waste is pumped into totes and shipped from the facility in tank trucks after having been pumped or vacuumed from the storage (tote) containers. These totes are included in the permitted storage capacity of the facility.

¹ Veolia reserves the right to utilize any sealant that may be proven to perform as effectively as the sealant identified herein, or, as new products become available, is proven to be more effective than the selected sealant.

D.1.3.3 Layout of Building 4

Building 4 currently contains PCB waste storage, non-PCB storage, and various RCRA and non-RCRA activities. Figure 4 shows the facility layout as it currently exists.

D.1.3.4 Outdoor Storage Areas

All regulated PCB storage is performed under roof in the aforementioned permitted storage areas. The only outside storage of PCBs is during loading of outgoing bulk containers and storage of non-regulated items such as drained PCB-Contaminated carcasses and non-PCB items.

The outside storage of PCB materials during loading of outgoing bulk containers is limited to 72 hours and will be documented in the operating log. The bulk containers are lined and equipped with a weather-resistant tarp and are covered to prevent storm water infiltration. The storage area is completely enclosed by masonry walls, chain-link fence, and gates topped with barbed and/or razor wire.

D.1.4 Inventory Control

All incoming TSCA regulated materials are barcoded. Barcoding assists in tracking materials throughout the facility and to the final disposal locations. Barcoding does not allow Veolia to perform a mass balance on materials due to differences in units of measures (i.e., some materials are tracked by weight, and others by volume depending on whether they are solid or liquid materials). Incoming weights and outgoing weights are tracked manually and electronically. The system consists of a hand-held scanning device that is programmed to track inventory by location on site, and to keep a running total of inventory (by gallons, type of equipment, pounds, or number of drums) by site location. The hand-held scanner collects data which are then downloaded to a computer; associated software then generates reports for tracking the location of materials on site, and total site inventory quantities. Appendix D contains information regarding the system including an Operations Manual with instructions on the use of the hand-held scanning device, and details on how to use the scanner to track movement of materials within the facility including the repackaging of materials (complete and partial re-packs), tracking of units by weight, and the decanting of liquids to and from containers. The barcoding system is routinely upgraded and modified; the information presented herein is provided for informational purposes.

D.1.5 Management of PCB Containers

PCB containers include any container, package, can, bottle, bag, barrel, drum, tank or other device that contains PCBs or PCB Articles and whose surface has been in direct contact with PCBs. All drums, totes and tri-wall boxes used at the facility for the purpose of containing PCBs and PCB items must meet DOT performance-oriented packaging (POPs) standards and in

accordance with DOT Hazardous Material Regulations (HMRs) at 49 CFR parts 171 through 180 per 40 CFR 761.65(c)(6).

Any PCB containers which have external PCB contamination shall be managed as a regulated PCB Article or decontaminated in accordance with 40 CFR 761.79(c). Any PCB container which has internal PCB contamination may continue to be reused at the facility; however its regulatory status must be in accordance with the highest level of PCBs to which it was exposed. Otherwise, PCB containers which have been contaminated may be disposed of at a TSCA landfill provided any residual (free flowing) liquids have been drained from the container.

With regard to the management of roll-off units, PCBs and PCB Articles do not come in direct contact with the exterior of the roll-off units. With regard to the interior of roll-off units, each unit is lined with a 4-mil poly liner prior to waste being placed into the unit.

D.1.6 Processing Procedures

The following sections describe the PCB and PCB-contaminated processing activities occurring at the facility.

D.1.6.1 Equipment Procedures

PCB and PCB-contaminated electrical equipment are tagged with the appropriate color coded sticker upon arrival based upon material profile sheets and required laboratory analysis data as outlined below:²

- Red Dot – means over 499 ppm PCBs
- Blue Dot – means between 50 and 499 ppm PCBs
- Green Dot – means less than 50 ppm PCBs; the processing and storage of these items is not regulated under TSCA and is not further discussed in this application.
- Yellow Dot – means “Do Not Process,” oil is being tested and we are awaiting the laboratory analysis.

The following equipment is processed at Veolia:

- PCB Transformers \geq 500 ppm PCB
- PCB Electrical Equipment \geq 500 ppm PCB

² Laboratory analysis data are requested from each customer at the time their profile is submitted to VES for material approval. If not provided materials are assumed to be greater than 500 ppm.

- PCB Bushings ≥ 500 ppm PCB
- PCB Cable ≥ 500 ppm PCB
- PCB-Contaminated Transformers ≥ 50 ppm and < 500 ppm PCB
- PCB-Contaminated Electrical Equipment ≥ 50 ppm and < 500 ppm PCB
- PCB- Contaminated Bushings ≥ 50 ppm and < 500 ppm PCB
- PCB-Contaminated Cable ≥ 50 ppm and < 500 ppm PCB

D.1.6.1.1 Processing of PCB Transformers

For transformers which are ≥ 500 ppm PCB, the transformer is drained and then filled with a solvent, the transformer is allowed to stand for at least 18 continuous hours, and then the solvent is thoroughly removed. Drained and flushed fluids are collected and stored for off-site incineration. Absorbent is then added to the carcass, which is then shipped to an approved TSCA disposal facility. Alternatively, these items can be shipped as is to another TSCA facility for processing without draining or flushing.

D.1.6.1.2 Processing of Other PCB Electrical Equipment, except Cable and Bushings

For electrical equipment which is ≥ 500 ppm PCB, the equipment is drained to the extent practical. Drained fluids are collected and stored for incineration. Absorbent is added the carcass which is then shipped to an approved TSCA disposal facility. Alternatively, these items can be shipped as is to another TSCA facility for processing.

D.1.6.1.3 Processing of PCB Bushings

For PCB bushings, the bushing and its associated components are disassembled and any free-flowing liquids are drained, collected and stored for subsequent incineration at a TSCA approved disposal facility. Residual rubber, wood, plastic, unrecoverable metals and ceramics are collected and prepared for disposal at a TSCA landfill. Copper and other recoverable metals are then managed in accordance with Section D.1.6.2 Metals Recovery below. Alternatively, these items can be shipped as is to another TSCA facility for processing or disposal.

D.1.6.1.4 Processing of PCB Cable

PCB cable is stripped to separate the inner copper wire from the external casing and insulating components. Residual rubber, wood, plastic and/or vinyl are collected and prepared for disposal at a TSCA landfill. The recoverable metals are then managed in accordance with Section D.1.6.2 Metals Recovery; below. Alternatively, these items can be shipped as is to another TSCA facility for processing.

D.1.6.1.5 Processing of PCB-Contaminated Transformers

For transformers that contain 50 to <500 ppm PCB oil, the equipment is drained. Drained fluids are collected and stored for incineration or reclamation at a TSCA approved facility. The carcass is shipped to an approved TSCA-approved facility for disposal or recycling.

D.1.6.1.6 Processing of PCB-Contaminated Electrical Equipment, except Cable

For electrical equipment that is contaminated with 50 to <500 ppm PCB, the equipment is drained to the extent practical. Drained fluids are collected and stored for off-site incineration or reclamation. Equipment components are then physically separated to the extent practical; non-recoverable items such as wood, rubber, ceramics and paper are shipped to a TSCA-permitted landfill or incinerator for disposal. Recoverable metals are then managed in accordance with Section D.1.6.2 Metals Recovery. Alternatively, these items can be shipped as is to another TSCA facility for processing.

D.1.6.2 Metals Recovery

With the submittal of this renewal application, Veolia wishes to decontaminate metals removed from PCB and PCB-contaminated bushings and cable and other PCB-contaminated items in accordance with 40 C.F.R. § 761.79(b)(3). In January 2014, EPA issued Veolia an approval pursuant to 40 CFR 761.79(h) to conduct alternate decontamination and sampling methodology of non-porous surfaces. Veolia reserves the right to implement decontamination procedures in accordance with decontamination standards and procedures listed in 40 C.F.R. § 761.79(c)(3) or 40 C.F.R. § 761.79 (c)(4) or submit an application for use of other alternate decontamination procedures, per 40 C.F.R. § 761.79(h).

Veolia reserves the right to seek an alternate sampling approval in accordance with 40 C.F.R. § 761.79(h)(3) and operate under such approval when granted.

Currently, it is not the practice of Veolia to recover metals from PCB Transformers and PCB Contaminated Transformers; however, Veolia reserves the right to recover select metals from other PCB and PCB-contaminated items in the future, subject to the metals being sufficiently decontaminated in accordance with 40 C.F.R. § 761.79(c)(3) or 40 C.F.R. § 761.79 (c)(4). Veolia will not recover PCB Transformer cores. (Described in the April 16, 2007 EPA Guidance Document on the Decontamination of Transformers.)

D.1.6.2.1 Decontamination Process

Once removed from equipment, metals that have been in contact with liquids containing PCBs and have been selected for recovery and decontamination are placed on a steel draining table for

a minimum of 15 hours to allow all free liquids to be removed. The metals may be manually wiped down to remove the maximum amount of residual PCBs prior to the bath process.

The metal decontamination process is a batch process. A batch of metals is selected, inventoried by type, size and weight of metal. At this time a total surface area is also calculated. Cable wire will be processed separately from other materials.

The selected batch is loaded into a basket and placed into a recirculating bath and allowed to soak for a minimum of 16 hours.

The basket is removed from the bath and the materials are allowed to air dry.

D.1.6.2.2 Sampling Process

The decontaminated materials will be sampled to demonstrate that the materials meet the following decontamination standards. Bare metal recovered from electrical equipment such as bushing rods, cable, wire, plates and sheeting is nearly flat (smooth and even; without marked lumps or indentations) non-porous surfaces. Veolia also considers the metal surfaces that were in contact with PCB Liquids within a concentration of less than or equal to 0.50% or 5,000 ppm PCBs to be surfaces contaminated by a single source of PCBs with a uniform concentration.

D.1.6.2.3 Decontamination Standard Liquid PCB Contact (40 CFR 761.79(b)(3)(i)(A)):

The decontamination standard for non-porous surfaces in contact with liquid PCBs.

For unrestricted use for non-porous surfaces previously in contact with liquid PCBs at any concentration, where no free-flowing liquids are currently present, ≤ 10 micrograms PCBs per 100 square centimeters ($\leq 10 \mu\text{g}/100 \text{ cm}^2$) as measured by a standard wipe test (§ 761.123).

D.1.6.2.4 Decontamination Standard Non-Liquid PCB Contact (40 CFR 761.79(b)(3)(i)(B)):

For non-porous surfaces in contact with non-liquid PCBs (including non-porous surfaces covered with a porous surface, such as paint or coating on metal), cleaning to Visual Standard No. 2, Near-White Blast Cleaned Surface Finish, of the National Association of Corrosion Engineers (NACE). A person shall verify compliance with standard No. 2 by visually inspecting all cleaned areas.

SSPC-SP10 / NACE 2 Near-White Blast Cleaning

When viewed without magnification shall be free of all visible oil, grease, dust, dirt, mill scale, rust, coating, oxides, corrosion products and other foreign matter of at least 95% of

each unit area. Staining shall be limited to no more than 5 percent of each unit area, and may consist of light shadows, slight streaks, or minor discolorations caused by stains of rust, stains of mill scale, or stains of previously applied coatings. Unit area shall be approximately 3 in. x 3 in. (9 sq. in.). If this standard is utilized, pictorial documentation must be collected to demonstrate the efficacy.

D.1.6.2.5 Composite Sampling:

For a surface originally contaminated by a single source of PCBs with a uniform concentration, it is permissible to composite surface wipe test samples and to use the composite measurement to represent the PCB concentration of the entire surface. Analytical results will be presented as micrograms per 100 square centimeters (ug/100cm²) by dividing the total mass of PCBs by the total areas sampled. Composite samples consist of more than one sample gauze extracted and chemically analyzed together resulting in a single measurement. The composite measurement represents an arithmetic mean of the composited samples.

Composite sampling may be utilized when sampling larger surface areas of decontaminated metals from the same decontamination batch, for example copper wire.

All composite wipe samples will be extracted and analyzed in accordance with EPA Method 3540C (Soxhlet extraction) or latest revision; or EPA method 3550C (Ultrasonic extraction) or latest revision. Veolia will include the range of acceptable quality control criteria for analysis of composite wipe samples.

For small or irregularly shaped surfaces or large nearly flat surfaces, if the surfaces are contaminated by a single source of PCBs with a uniform concentration, composite a maximum of three adjacent samples.

- Example: Calculated surface area of copper wire from a single source is 150 square meters. 10% sampling would require 15 samples. Or 5 - 3 part composites.

D.1.6.3 Sampling Decontaminated Metal Pieces:

The sampling methodology is based on the CFR 761.79(h) approval issued by EPA. Non-porous metal pieces with a minimum surface area of 100 square centimeters will be sampled in accordance of this subsection. Examples include rod, pipes, plates and sheets.

D.1.6.3.1 Determining the Number of Samples to Collect:

The total surface area will be determined for all the material going into each decontamination batch. The total surface area will be used to determine the number of 100 square centimeter samples “n” required to comprise at least 10% of the total surface area in the batch.

A minimum of three(3) samples will be collected.

For a batch that has less than three(3) square meters of surface area, three(3) random samples will be collected.

For a batch with greater than three(3) square meters of surface area, random samples will be collected for a minimum of 10 percent of the total area. The number of samples required will always be rounded up to the next highest integer.

- Example: Calculated surface area 10 square meters: $10\% = 1$; Since $1 < 3$ three random wipe samples will be collected.
- Example: Calculated surface area 35 square meters: $10\% = 3.5$; ROUNDUP to 4. Since $4 > 3$ four(4) random wipe samples will be collected.

D.1.6.3.2 Sample Location Process

Traditional sample location selection techniques are designed for sampling based on a 2 dimensional grid. Selecting and accessing precise 3 dimensional sample locations within the decontamination basket is not practical due to potential different shapes and sizes of material in the decontamination basket.

To allow for random sample selection from the basket, Veolia will use a random number generator to select specific pieces of metal. Samples will be collected as individual pieces are pulled out of the decontamination basket. Since the total number of pieces in any batch is a known, the number generator will be set appropriately for that maximum number. The first piece removed being number one, the second piece being number two and so on until all pieces selected for sampling are reached. If the piece identified for sampling has a surface area of less than 100 cm^2 , the subsequent piece(s) will be included in the sample until a 100 cm^2 surface area is achieved.

D.1.6.3.3 Sample Collection Process

The objective of this procedure is to assure that proper techniques are followed to assure appropriate sampling location selection is random throughout the batch and can be demonstrated and repeated.

1. After the batch has been washed and the materials are allowed to air dry, a Material Handler stages the decontamination basket in a designated sampling area.
2. Set the Random Number Generator to a maximum number equal to the total number of pieces in the batch.
3. Generate a series of random sample numbers equal to “n” required samples.
4. Sort the random sample numbers from smallest to largest and record in the Sampling Log.
5. Place the “receiving container” near the end of the basket.
6. Starting at the corner of the decontamination basket nearest to the receiving container, the Material Handler will remove pieces of metal by hand from the basket in a clockwise manner and in layers from top to bottom.
7. Each piece removed from the basket is counted and place into the receiving container.
8. When the Material comes to a piece that is to be sampled, a trained “Sampler” will remove that piece.
9. The type of piece, rod, pipe, sheet, sleeve; is recorded in the Sampling Log.
10. The Sample will use a 100 square centimeter template or for small diameter rods may have to calculate the length of the material to wipe and record the method in the Sampling Log.
11. This process will be repeated until all samples are collected.

D.1.6.3.4 Sampling - Decontaminated Cable Wire:

Non-Porous Cable will be processed separately from other materials.

D.1.6.3.5 Determining the Number of Sample to Collect

The total surface area will be determined for all the cable going into each decontamination batch. The total surface area will be used to determine the number of 100 square centimeter wipe samples “n” required to comprise at least 10% of the total surface area in the batch. “n” is always rounded up to the next integer.

D.1.6.3.6 Collecting the Samples

Traditional sample location selection techniques are designed for sampling based on a 2 dimensional grid. Selecting and accessing precise 3 dimensional sample locations within the decontamination basket is not practical for cable wire.

To allow for randomness in the sample selection and to provide a distribution throughout the decontamination basket, the required number of samples “n” is collected at random weight increments throughout the batch as determined by a random number generator. Scales will be used to weigh the material as it is removed from the decontamination basket. For the sake of ease of handling, it is acceptable to first load the storage containers and then apply the above process to collect samples.

For cable wires, a three part composite sampling in accordance with 761.312 will be done until the total number of samples “n” is collected.

- Example: Surface area of cable in the batch equals 100 square meters. Therefore, the number of samples would be 10% of 100 for a total 10. An initial single wipe sample and three more three part composite samples would be taken.

D.1.6.3.7 Sample Location Process

The objective of this procedure is to assure that proper techniques are followed to assure appropriate sampling location selection is random throughout the batch and can be demonstrated and repeated.

1. After the batch has been washed and the materials are allowed to air dry, a Material Handler stages the decontamination basket in a designated sampling area.
2. Set the Random Number Generator to a maximum number of 100.
3. Generate a series of random sample numbers equal to “n” required samples.
4. Sort the random sample numbers from smallest to largest and record in the Sampling Log.
5. Divide the weight of the batch by 100 to determine the weight increments “x” and record this in the Sampling Log.
6. Calculate the target weight sampling points by multiplying the randomly generated sampling number by the weight increment and enter that weight next to the random sample number in the Sampling Log.
7. Based on the gauge of the cable, determine the length of cable needed to equal 100 square centimeters.

8. Record both the gauge and the length in the Sampling Log.
9. Place a “receiving container” on a scale.
10. Starting at the corner of the decontamination basket nearest to the receiving container, the Material Handler will remove cable with a gloved hand from the basket in a clockwise manner and in layers from top to bottom.
11. Place the removed cable into the receiving container until the determined sample/weight point is reached. Record the weight in the Sampling Log. To avoid double handling, a 10 % weight variance is acceptable.
12. A trained Sampler will then pull a length of cable in sufficient length to collect a 100 square centimeter wipe sample.
13. Place the sealed numbered sample vial in the sample collection container.
14. This process will be repeated until all samples are collected.
15. If composite sampling is utilized, three gauze sample will be combined into one sample vial and documented in the Sampling as well on the Chain of Custody documents.

D.1.6.4 Sampling Procedure.

The objective of this procedure is to compliment the sample location procedures to assure that proper sample techniques are followed to assure accurate results.

1. After the total number of wipe samples to be collected is determined, prepare the sampling log for entry of the sampling time, sample number, date, and type of material and any pertinent notes describing the sampling event.
2. Prepare all sampling equipment in sufficient quantity to collect the prescribed number of samples.
3. Determine sampling area and mark with 100 square centimeter template (larger metal surface) or based on determine length of wire and mark accordingly.
4. With gloved hands, remove cap from the sample vial.
5. Extract gauze from packaging.
6. Add 5 ml of hexane to the gauze.
7. Using a gloved hand, immediately start applying the gauze to the surface of the metal, wiping the marked area completely two times.
8. Allow the gauze to air dry.
9. Fold to where the sample side is on the inside
10. Place into the sample vial.
11. Put lid back on the vial.
12. Remove and discard gloves.
13. Label the vial and fill out the sampling details on the Sampling Log and chain of custody forms.

14. Repeat until all samples are collected.

D.1.6.5 Evaluation of Sample Results

A minimum of 10% of the surface area in each decontamination batch will be tested after cleanup, as indicated in the Application.

All materials will be held in storage until the results from all samples are reported.

If the wipe sample results indicate that PCBs are detected below the 10 ug/100 cm² standard in any of the items sampled in a given batch, all items in the batch are considered to have achieved the standard set forth in 40 C.F.R 761.79(b)(3), and can be shipped to an off-site recycler.

If PCBs in any wipe sample in a given batch are detected above the 10 ug/100 cm² standard, then the entire batch failed the wipe test. Veolia will evaluate to determine if the material will be reprocessed including resampling in accordance with the Facility Operating Plan or if the materials will be manifested off site to an approved TSCA permitted facility.

In accordance with 40 CFR 761.61(a)(5)(ii), non-porous surfaces detected between 10 ug/100 cm² and 100 ug/100 cm² may be disposed at a RCRA Subtitle C hazardous waste landfill, TSCA approved landfill, or municipal solid waste landfill, as long as the receiving disposal facility's permit allows acceptance of that type of waste.

D.1.6.6 Soak Solution

The soak solution utilized contains at least 40 gallons of non-polar organic solvents(20 gallons of Diesel Fuel and 20 gallons of Kerosene), 15 gallons of detergent and the balance is water. Water is added to the bath until the materials to be washed are completely submerged. The water volume ranges from between 250 and 400 gallons. The detergent is an organic non-ionic surfactant. The soak solution is continually agitated during the wash process. The solution is removed from the tank by an outlet located at the base of the tank, approximately six inches from the bottom of the tank. The solution is passed through a pump and reintroduced at the bottom and midway sections of the tank. The rapid movement of the reintroduced solvent causes agitation that helps clean the metal placed into the tank. Air is not introduced into the solution.

In general, lipophilicity increases with increasing degree of chlorination; vapor pressure and water solubility decrease. Thus, all PCBs are lipophilic and poorly soluble in water and all PCBs are considered very soluble in non-polar organic solvents such as diesel fuel, kerosene, hexane, mineral oil, or terpenes. The term very soluble equates to 1 gram or more of solute(PCB) to every ml of solvent or better than a 1:1 ratio.

To demonstrate that the soak solution is at least 5% non-polar organic solvents and the PCBs are soluble to at least 5% by weight, the most conservative amount of water, 400 gallons, would be used. Also, to be conservative, the organic based surfactant that does have ability to solubilize PCBs, will be not be considered in the solubility calculation. The 40 gallons of solvent in a maximum total volume of 455 gallons equals 8.79%.

D.1.6.6.1 Soak Solution Longevity

For a period of three months sampling and analysis of the soak solution will occur twice per work week to insure the PCB levels of the solution remain below 50 ppm. Once performance data are obtained such that the utilization/longevity rate can be determined for the solution, sampling will occur on a no less than once per month basis. Samples will be analyzed for PCBs using SW-846 Method 8082, and the soak solution testing program for PCBs will be fully documented with appropriate records being kept (e.g., laboratory analytical reports, solution change-out logs, and other documentation pertinent to documenting PCB concentration and solution change-out rates). If PCB concentrations in the soak solution reach 50 ppm, the soak solution will be changed out before further decontamination operations occur. Veolia reserves the right to petition the EPA to modify the soak sampling schedule after the initial three month performance period has passed

Regarding the above solution sampling protocol, Veolia will not sample the solution if it is not used in a given week. Additionally, Veolia will only sample the solution once per week, prior to its use, if the solution is used for decontamination only one time that week. Otherwise, the solution will be tested twice per week; once at the beginning of the week and once at the end of the week, for three months. Following the three month period, Veolia will reduce its sampling schedule to no less than once per month, or increase the schedule if appropriate, in accordance with collected longevity rate data. Re-usage rates will be based upon the most conservative applicable use scenario being evaluated. Documentation and logs of usage activity will be retained.

D.1.7 Management of Movable Equipment

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

Additionally, and to minimize the potential for cross-contamination via movable equipment, Veolia has dedicated specific equipment for use within Building 3 and for the management of PCBs and PCB Items; this movable equipment is restricted to Building 3. These dedicated pieces

of equipment are marked such that the restrictions associated with their use are clear to site personnel.

D.1.8 Procedures for Bulk Transfer of Fluids

The procedure for the transfer of bulk fluids from containers to transport vehicles is included in the facility SPCC Plan (included in Appendix D of this document).

D.1.9 Management of Laboratory Samples

Veolia will manage its laboratory samples in accordance with the provisions provided at 40 CFR 761.65(i). Generally, laboratory samples generated by Veolia are exempt from manifesting requirements provided that the sample is being shipped for analytical purposes and U.S. Department of Transportation and U.S. Postal Service shipping requirements regarding packaging and labeling requirements are followed.

Should Veolia receive laboratory wastes from a third-party for disposal, these materials would be subject to standard manifesting requirements.

D.1.10 Facility Decontamination

Porous Surface Decontamination: In accordance with 40 CFR 761.30 (p), continued use of porous surfaces contaminated with PCBs regulated for disposal by spills of liquid PCBs is allowable provided the area is properly decontaminated. Any person may use porous surfaces contaminated by spills of liquid PCBs at concentrations $>10 \mu\text{g}/100 \text{ cm}^2$ for the remainder of the useful life of the surfaces and subsurface material if the following conditions are met:

- (i) The source of PCB contamination is removed or contained to prevent further release to porous surfaces.
- (ii) If the porous surface is accessible to superficial surface cleaning:
 - (A) The double wash rinse procedure in subpart S of this part is conducted on the surface to remove surface PCBs.
 - (B) The treated surface is allowed to dry for 24 hours.
- (iii) After accessible surfaces have been cleaned according to paragraph (p) (1) (ii) of this section and for all surfaces inaccessible to cleanup:
 - (A) The surface is completely covered to prevent release of PCBs with:
 - (1) Two solvent resistant and water repellent coatings of contrasting colors to allow for a visual indication of wear through or loss of outer coating integrity; or

- (2) A solid barrier fastened to the surface and covering the contaminated area or all accessible parts of the contaminated area. Examples of inaccessible areas are underneath a floor-mounted electrical transformer and in an impassible space between an electrical transformer and a vault wall.
- (B) The surface is marked with the M_L Mark in a location easily visible to individuals present in the area; the M_L Mark shall be placed over the encapsulated area or the barrier to the encapsulated area.
 - (C) M_L Marks shall be replaced when worn or illegible.

Personnel Decontamination: Persons participating in decontamination activities shall wear or use protective clothing or equipment to protect against dermal contact or inhalation of PCBs or materials containing PCBs. The employees who work in PCB area will enter and don the appropriate PPE for the work area. Appropriate PPE will consist of a Veolia work uniform, gloves, and steel toed boots with boot covers. If an employee has not been issued a work uniform they must wear a Tyvek or comparable disposable suit while working in the process area. When exiting the process area for break or end of work day the employee will remove boot covers and or disposable suit and put into a container for disposal. Leather gloves and items that may have come in contact with PCB material will be removed prior to leaving PCB containment area and entering the locker room. Employees will wash their hands and face with warm water and soap after entering the locker room to change into their street clothes.

Equipment and Non-Porous Surface Decontamination: VES intends to use the equipment for the life of the processing areas therefore not requiring decontamination until closure. Veolia will remove equipment from service at the time of closure and dispose of the equipment at a TSCA approved landfill, or will clean the non-porous surface and dispose of the materials as scrap metal.

D.1.11 Quarterly Wipe Sampling Plan

Wipe samples will be collected quarterly from Buildings 2, 3, and 4 on the 2nd week of the 1st month of each Quarter (January, April, July, and October). Once per year, Veolia will hire a third party to collect the wipe samples for that quarter. A total of (12) twelve (12) samples will be collected each quarter, four (4) samples from each building, consisting of (3) three floor wipe samples and (1) one doorknob wipe sample.

One sample will be collected from each of the following areas; PCB processing and/or storage area, non-PCB processing and/or storage area, administrative and support area, and doorknobs. Sampling locations will be selected randomly from a sampling grid overlaid on each building

(see Attachment D-4). One (1) floor wipe sample will be collected from a randomly selected one meter square grid for each of three areas in each of the three buildings and one wipe sample will be collected from a randomly selected doorknob from each of the three buildings. Each square meter grid and doorknob will be assigned a unique identification number. The Excel® random number function will be used to determine the randomly selected sample locations in each of the buildings for each of the sampling area types - $RAND ()*(b-a)+a$. The random number will be rounded to the nearest whole number to represent the grid square. Where a grid square overlaps two different area types, the grid will be included in both areas for random selection of the grid to be sampled.

Samples will be collected from the center of the selected square meter grid or partial grid unless visual staining or contamination is evident then sample collection will be biased to any stains or discoloration within the square meter grid. Doorknob samples will be collected by wiping both sides of the doorknob. For all other wipe samples a standard 100 cm² template will be used.

The standard threshold concentration of 10 ug/100 cm² will be used to define PCB contaminated material. Draft sampling grids have been developed based on the proposed layouts for Buildings 2, 3, and 4. After all improvements/changes are complete as designated by the final permit, the sampling grids will be finalized.

- The estimated number of sample whole and partial grids are approximately:

Building 2

- Administration Area = 120 grids / partial grids
- PCB Processing and/or Storage Area = 155 grids / partial grids
- Non-PCB Processing and/or Storage Area = 514 grids / partial grids
- Doorknobs = 4

Building 3

- Administration Area = 83 grids / partial grids
- PCB Processing and/or Storage Area = 538 grids / partial grids
- Non-PCB Processing and/or Storage Area = 183 grids / partial grids
- Doorknobs = 5

Building 4

- Administration Area = 146 grids / partial grids
- PCB Processing and/or Storage Area = 36 grids / partial grids
- Non-PCB Processing and/or Storage Area = 599 grids / partial grids
- Doorknobs = 4

For the purpose of this sampling plan the distinct sampling areas are defined as:

- Administration and Support Areas are the office, file storage areas, break areas, and adjacent restrooms
- PCB Processing and/or Storage Areas are the PCB disassembly, PCB sorting, and PCB storage areas
- Non-PCB Processing and/or Storage Areas are the locker rooms, walkways, restrooms adjacent to processing areas, and adjacent non-PCB work and receiving areas
- Doorknobs include all the doorknobs in the building being sampled

Standard EPA wipe sampling protocol will be followed for all sample collection and analysis. A brief hard copy report providing the quarterly wipe sampling results will be submitted on an annual basis. The report will contain a compilation of the data for the previous four quarters of wipe sampling. Wipe sampling reports will be submitted to EPA along with the Annual Report prepared in accordance with 40 CFR 761.180(b)(3). Records of the laboratory results for each quarter will be maintained at the Veolia facility, and will be readily available for EPA inspection. If, in any given quarter, the PCB concentration in any of the wipe samples exceeds 10 $\mu\text{g}/100\text{cm}^2$, EPA will be promptly notified, and a report providing results of that sampling event will be sent to EPA within 30 days of receiving the sampling results. Reports will be submitted to the Manager of the RCRA Facilities Management Office (mailing address provided below) and will provide: the analytical results; description of the sampling activities that were conducted; sample locations; and the name of the person and company collecting the samples.

Manager, Permits Office (LND-4-2)
 Land Division
 U.S. Environmental Protection Agency – Region 9
 75 Hawthorne Street
 San Francisco, CA 94105

D.1.12 Marking

Each of the storage areas and equipment subject to marking shall be marked in accordance with the regulations provided at §761.40 (a) using the M_L mark. Equipment requiring the M_L mark includes PCB containers, PCB transformers, PCB Large High Voltage Capacitors, PCB Large Low Voltage Capacitors at the time of removal from use, PCB Article Containers containing articles or equipment that must be marked in accordance with the regulatory protocol, and each storage area used to store PCBs and PCB Items for disposal.

Separate marking of PCB-Contaminated Electrical Equipment is not required in accordance with regulatory protocol; however, if the items are marked by the generator, Veolia will not make specific efforts to remove excess markings.

Where the M_L mark is specified but the PCB Article or PCB equipment is too small to accommodate the M_L mark, the M_S mark as described in §761.45(b), may be used instead of mark M_L .

All marks required by this subpart will be placed in a position on the exterior of the PCB Items or storage units so that the marks can be easily read by any persons inspecting or servicing the marked PCB Items or storage units.

D.2 FACILITY GREENING PROGRAM

In an effort of reuse in lieu of disposal, Veolia transferred the freezer formerly used in the ballast processing activities to another Veolia TSCA facility, who will put it to a similar use.

D.3 INSPECTION PROGRAM

Since the Veolia facility is typically manned at least five days per week, visual inspections of processing and storage areas occur on a daily basis. Personnel are expected to make observations as they conduct their routine activities. Should personnel discover a spill, leak, or other situation requiring immediate attention, personnel are trained to notify their supervisor immediately upon discovery. The spill, leak, or other occurrence is immediately addressed or, for corrective actions requiring a longer lead-time, the issue is documented and a work order is generated to schedule the repair.

D.3.1 Documented Inspections

Veolia conducts documented inspections of each work area on a weekly basis. These inspections include observations made related to housekeeping, access and egress, hazard communication protocols (labeling and availability of MSDs or SDSs), waste storage areas, material handling, electrical, fire prevention, emergency response, and pollution prevention. By inspecting weekly, Veolia exceeds the regulatory protocol for the inspection of PCB items (see 40 CFR §761.65(c) that mandates inspections at least once every 30 days). Additionally, no TSCA regulated PCB items will be stored outside. All PCB items will be stored in the buildings in the permitted storage areas. PCB items may be briefly staged outside prior to moving materials to indoor storage areas or being shipped in bulk roll-off containers for disposal. For example, a PCB transformer that is removed from a flatbed truck will be staged outside (in the receiving area) to allow for transfer by the lift truck to an indoor storage area.

Storage areas are specifically inspected to ensure the integrity of containment pods, the types and quantities of materials located within each area or pod, the availability of spill control equipment, labeling (marking of PCB areas), and access/egress to the storage areas. In addition, quarterly wipe sampling is performed on non-porous surfaces in accordance with the quarterly sampling plan provided in Attachment 1 of this Operating Plan.

Processing and storage areas are specifically inspected to ensure the integrity of containment pods, the types and quantities of materials located within each area, , the availability of spill control equipment, labeling (marking of PCB areas), the use of personal protective equipment by operations personnel, access/egress to the processing areas, and the use and restrictions associated with movable equipment.

A copy of the facility inspection form is included in the Spill Prevention Control and Countermeasure Plan attached to Appendix D.

D.3.2 Bulk Tank Inspections

The Veolia facility includes one bulk product tank, one used oil tank and numerous totes that are subject to the Clean Water Act (CWA) Spill Prevention Control and Countermeasure (SPCC) planning requirements found at 40 CFR 112 as bulk storage containers. Monthly bulk tank inspections include inspection of metal surfaces, valves, pumps, tank foundations and supports, bolts, rivets, nozzle connections, and containment areas to identify any leaks, threats of leaks, corrosion, and abnormalities. Leaks, threats of leaks, corrosion, and abnormalities are recorded on the inspection form and are promptly corrected.

D.3.3 Emergency Response

Veolia has developed a Spill Prevention Control and Countermeasures (SPCC) Plan for its site activities. The SPCC Plan is the emergency response planning document and will be referred to for all emergency events. Should an emergency event include a spill or release of an oil or oil-based substance, including PCBs and PCB items, then the SPCC Plan must be additionally consulted for further actions, mitigation measures, and/or additional reporting requirements. The SPCC Plan is appended to this document.

D.4 RECORDS AND REPORTING PROGRAM

Veolia maintains a variety of records and generates reports as part of its facility operations. Recordkeeping activities and reporting activities are described in the Tables provided below.

As a commercial storage facility, Veolia will prepare and maintain written forms, documents, and data, from which a written annual document log will be developed. The written document

log will include information on PCBs and PCB Items that were handled as PCB waste at the facility. The written annual document log is prepared by July 1 of each year for the preceding calendar year. The written annual document log will be maintained at the facility for at least three years after the facility is no longer used for the storage or disposal of PCBs and PCB Items. The records that comprise the annual document log will be maintained for the same period of time, and include the records required in accordance with 40 CFR 761.180(b)(2). Annual reports will be prepared from the annual document log and will provide a summary of PCB activities in accordance with 40 CFR 761.180(b)(3). Table D-1 provides the names of the records maintained, describes the content and format of each record, and lists its corresponding retention timeframe. Table D-2 summarizes required reporting. Records and reports are available for inspection by authorized representatives of the EPA.

D.4.1 Subpart J General Records and Reports (40 CFR 761.180(b))

Copies of records and reports are retained for a period of three years as required in accordance with TSCA regulations, except as where it is specifically required that Annual Records [manifests, certificates of disposal, records of inspection and cleanups, and as specified under 40 CFR 761.180(b)(1)] be retained for a period of at least three years after the facility is no longer used for the storage or disposal of PCBs and PCB items. Records are retained on-site and typically in hard-copy format.

Veolia is not subject to the records and reporting requirements of Subpart J of 40 CFR 761.185, 761.187 or 761.193.

As required by 40 CFR 761.180(b)(1), annual records include the following:

- All signed manifests generated by or received at the facility during a calendar year;
- All Certificates of Disposal that have generated or been received by the facility during the calendar year;
- Records of inspections and cleanups performed in accordance with 40 CFR 761.65(c)(5).

In addition, regulatory required records and reporting includes the following:

- Results of quarterly wipe sampling

As required by 40 CFR 761.180(b)(2), a written annual document log shall be prepared by July 1 for the previous calendar year and shall include:

- The name, address, and EPA identification number of the facility, and the reporting year;
- For each manifest generated or received:
 - For bulk waste, its weight in kilograms, the first date the PCB waste was placed in the tanker or truck was removed from service for disposal, the date it was received at the facility, the date it was placed in transport for off-site disposal, and the date of disposal;
 - The serial number or other identification for each PCB Article, its weight in kilograms, the date it was removed from service for disposal, the date it was received at the facility, the date it was placed in transport for off-site disposal, and the date of disposal;
 - The unique number assigned by the generator identifying the PCB Container or PCB Article container, a description of its contents, its weight, the first date PCB waste placed in each PCB Container was removed from service for disposal, the date it was received at the facility, the date each PCB Container was placed in transport for off-site storage or disposal, and the date the container was disposed of; and
 - The confirmed disposal date for each of the above items.

The above information is also compiled for “any PCB waste disposed at the facility that generated the PCB waste or any PCB waste that was not manifested to the facility”.

As required by 40 CFR 761.180(b)(3), a written annual report shall be submitted by July 15 for the previous calendar year and shall include:

- The name, address, and EPA identification number of the facility covered by the report and the calendar year;
- A list of the numbers of all signed manifests of PCB waste initiated or received by the facility during that year;
- The total weight in kilograms of bulk PCB waste, PCB waste in PCB Transformers, PCB waste in Capacitors, PCB waste in PCB containers in storage at the facility at the beginning of the calendar year, received or generated by the facility, transferred to another facility, or disposed of at the facility during the calendar year.

- The total number of PCB transformers, large capacitors, PCB Article Containers, or PCB containers in storage at the facility at the beginning of the calendar year, received or generated by the facility, transferred to another facility, or disposed of at the facility during the calendar year.
- The total number of PCB transformers, large capacitors, PCB Article Containers, or PCB containers in storage at the facility at the beginning of the calendar year, received or generated by the facility remaining in storage at the end of the year.
- The total weight in kilograms and number of bulk PCB waste, PCB waste in PCB transformers, PCB waste in large capacitors, PCB waste in PCB Article Containers, and PCB waste in PCB containers remaining in storage for disposal at the facility at the end of the calendar year.

In addition to regulatory required records and reporting includes the following:

- The results of quarterly wipe sampling for non-porous areas in which PCBs are stored or managed.

D.4.2 Subpart K PCB Waste Disposal Records and Reports

Veolia is subject to the record and reporting requirements of 40 CFR 761 Subpart K including the requirement to obtain an EPA identification number, the completion of the Notification of PCB Waste Activity form (EPA Form 7710-53), the use and retention of manifests, manifest discrepancy reporting, reporting of un-manifested waste, exception reporting, and the issuance of Certificates of Disposal and/or Recycling.

D.4.3 Reporting

Veolia is subject to a variety of reporting in accordance with TSCA requirements. The summary table below provides a list of the reports submitted, as well as a description of the information in the report, the submittal date, the agency, and the format of the report.

Reports are generated either electronically or in hard-copy format. A copy of each report sent to a regulatory agency is retained at the facility for a period of at least three years.

TABLE D-1: RECORDS

Reference	Record Name	Record Description	Retention*
1	Waste Profiles	Describes waste including its source (generator and process) and hazardous/toxic constituents. Includes: <ul style="list-style-type: none"> • Completed Veolia profile form or similar documentation • May include laboratory analysis, MSDS, or other data 	
2	Analytical – Profiling	Supports Profile descriptions; generally provided by generator. Includes: <ul style="list-style-type: none"> • Analytical results 	
3	Manifests/Shipping Documents	Shipping record; identifies the generator, date of shipment, type and quantities of materials shipped, the transporter, and indicates the state of the material (solid or liquid) and it may identify a disposal facility in addition to Veolia; includes manifests and shipping document for the receipt of waste from off-site, and the transport of waste off-site by Veolia. Includes: <ul style="list-style-type: none"> • Uniform hazardous waste manifest or other bill of lading or written, multi-copy manifesting form • May include attachment sheets 	Retained for 3 years after facility closure
4	Waste Acceptance Report	Documents the receipt of waste at the facility including the type, quantity, weight or volume, and the storage location at the facility. Date removed from service is also noted. Includes: <ul style="list-style-type: none"> • Manual logging sheets used to document receipt of materials, and to link receipt with original shipping paperwork • Data is then transferred to an electronic database (full implementation of bar-coding system will alleviate need for manual data entry) 	
5	Facility Operating Record	Includes details regarding generator, date of receipt, type of material received, quantities received, management of the materials at the facility, on-site storage location, and details concerning materials spill, recovery and disposal. Includes: <ul style="list-style-type: none"> • Facility generates annual operating record from other facility records generated during the course of business. This information is retained in an electronic database. 	Retained for 3 years after facility closure
6	Production Reports	Reports on various daily production elements including piece counts and production rates, and equipment serial numbers. Includes: <ul style="list-style-type: none"> • Material receiving reports • Inventory reports • Processing reports 	
7	Production Logs	Reports on various daily production elements including piece counts and production rates; may include details on equipment, equipment pumping, and solvent change-out rates. Includes: <ul style="list-style-type: none"> • Manual logging sheets reflecting the above daily production elements. Logging sheets are specific to processing areas. 	

Reference	Record Name	Record Description	Retention*
8	Analytical – Material Recovery and Site Operations	Various analytical results related to: effectiveness of solvent solutions in dip tanks; categorization of recovered fluids (PCB level); material recovery analysis. Includes: <ul style="list-style-type: none"> • Results of qualitative testing and screening • Results of analytical/quantitative testing • Production reports (to reflect quantities, lots, piece counts and/or poundage. • Results of quarterly wipe sampling of PCB storage, production, and potential contact areas. 	
9	Site Inspections	Documents results of facility inspections; documented inspections are conducted weekly. Includes: <ul style="list-style-type: none"> • Weekly safety inspection and audit checklist form • Records of authorized inspections by regulatory agencies including associated reports and communications. • Monthly and annual tank inspection forms (bulk storage tanks) • Periodic integrity testing documentation for bulk storage tanks 	Retained for 3 years after facility closure
10	Site Training documentation	Documents training activities including dates, personnel in attendance, and topics discussed. Includes: <ul style="list-style-type: none"> • Training certificates for off-site training • Training agendas for in-house training • Training sign-in sheets for in-house training • Training tests/demonstration of understanding • Documented training programs 	
11	Off-site Shipment records	Describes materials shipped off-site for recovery or disposal. Includes type of material, quantity shipped, disposition (disposal or recovery), and identifies the destination facility. Includes: <ul style="list-style-type: none"> • Bills of lading for non-regulated materials • Uniform hazardous waste manifests for TSCA-regulated materials • LDR forms, where applicable • Truck weigh tickets • Certificates of destruction, recycling, or disposal 	Retained for 3 years after facility closure
12	Written Annual Document Log	Developed by July 1 for the preceding calendar year activities; compiles much of the information compiled in other site records. Includes: <ul style="list-style-type: none"> • Written log summarizing activities of the preceding calendar year. This log includes those elements specified at 40 CFR 761.180(b)(2). 	Retained for 3 years after facility closure
13	Certificates of Recycling and Disposal	Documents final disposition of materials received. Includes: <ul style="list-style-type: none"> • Certificates of destruction, recycling or disposal 	Retained for 3 years after facility closure

Reference	Record Name	Record Description	Retention*
14	Records of Spill Cleanups	Documents spills and cleanups including date, quantity spilled, media impacted, and remedial efforts undertaken. Includes: <ul style="list-style-type: none"> • Documentation of spill event/ spill notification form • Documentation of corrective actions taken • Documentation of reporting including who was notified and the information submitted to the agency • May include analytical results • May include photographs (before and/or after photographs) • May include disposal documentation 	Retained for 3 years after facility closure
15	SDSs	Safety Data sheets for PCB and for other hazardous materials. Includes: <ul style="list-style-type: none"> • SDS provided by product manufacturer or obtained from internet for common items 	30 years after facility closure
16	Agency correspondences	Formal written communications supplied to or by regulatory agencies pertaining to the storage or disposal of PCB or PCB Items at the facility. Includes: <ul style="list-style-type: none"> • All written communications from regulatory agencies including notices, documents, and inspections. 	
17	Permits and Authorizations	Permits and authorizations sought by Veolia or received from a regulatory agency. Includes: <ul style="list-style-type: none"> • Permits • Authorizations • Registrations • Other documentation demonstrating an authority to operate or conduct a specific activity. 	
18	EPA Identification Number	EPA Identification number. Includes: <ul style="list-style-type: none"> • Notification of receipt of ID number • Form 8700-12 completed at time of registration (copy of Application) 	
19	Notification of PCB Waste Activity	EPA Notification Form 7710-53. Includes: <ul style="list-style-type: none"> • Notification of receipt of number or registration • Copy of Application submitted to agency 	
20	Closure Cost Estimate	A current copy of the Closure Cost estimate associated with the TSCA Commercial Storage Permit. Includes: <ul style="list-style-type: none"> • Closure Plan • Itemized cost for completing closure • Closure cost estimate • Financial assurance mechanism 	

*Records are retained for three years unless otherwise noted.

TABLE D-2: REPORTING

Reference	Report Name	Report Description	Submittal Date	Agency	Verbal/Written/Both
1	Annual Document Log	Describes site activities associated with preceding calendar year. Prepared in accordance with 40 CFR 761.180(b)(2) and is prepared in accordance with that prescribed format.	Annually by July 1	EPA Regional Administrator Attn: WST-4	Written and comprised of various forms
2	EPA Form 7710-53	Notification of PCB Waste Activity	1 time notification	EPA Regional Administrator Attn: WST-4	Written Form
3	Manifest Discrepancy Report	Documents differences between type or quantity (10% by wt or variation in piece count) of a manifested shipment	Attempt to reconcile within 15 days; otherwise, report to EPA	EPA Regional Administrator Attn: WST-4	Written Report
4	Unmanifested Waste Report	Documents receipt of waste that is not properly accompanied by a manifest; use Form 8700-13B or by written letter	Within 15 days of receipt of unmanifested waste	EPA Regional Administrator Attn: WST-4	Verbal and Written Report
5	Exception Reporting	Failure to receive copy of manifest	Immediate notification of generator or transporter	Generator or Transporter	Verbal Report
		Failure to receive copy of manifest within 45 days	No later than 45 days from the date upon which the generator should have received the manifest	EPA Regional Administrator Attn: WST-4	Written Report
		One-year Exception Report (disposer)	No later than 45 days following the one-year storage for disposal date exceedance	EPA Regional Administrator Attn: WST-4	Written Report
		One-year Exception Report (commercial storer)	If waste was transferred within 9 months of date removed from service but CD has yet to be received by 13 months from date of removal from services	EPA Regional Administrator Attn: WST-4	Written Report
6	Spill Reporting	Report of an RQ (greater than 1 pound of PCB) spill or a spill impacting soil, water, or off-site resources, or that creates a sheen on water.	Verbal – immediately upon discover; written within 30 days of event	Varies with amount and disposition of spill and whether or not an RQ is triggered	Written and Verbal Report
7	Spill Reporting – SPCC	Report any one spill in excess of 1,000 gallons in a single event or more than 42 gallons of oil in each of two discharge events within any 12 month period, then report events to Regional Administrator under SPCC planning	Written –within 60 days of becoming subject to the requirement; modification of SPCC Plan, as needed, based on spill event history	EPA Region IX Regional Administrator	Written Report



Reference	Report Name	Report Description	Submittal Date	Agency	Verbal/Written/Both
8	Spill Reporting – ADEQ	Written report of activation of Contingency Plan	Verbal – immediately upon discovery; written within 15 days of becoming subject to reporting under 40 CFR 264.56(j)	ADEQ	Verbal and Written Report
9	Annual Report	Annual written report prepared in accordance with 40 CFR 761.180(b)(3). This report includes the results of quarterly wipe sampling within the Veolia facility, and any clean-up actions that occur as a result of that sampling.	July 15 of each calendar year	EPA	Written Report