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**TSCA SECTION 6(e)
PCB COMMERCIAL STORAGE
RENEWAL APPLICATION,
REVISION 10**

**Prepared for
VEOLIA ES TECHNICAL
SOLUTIONS, L.L.C.**

**URS Job No. 23446814
June 2015**

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1.0 INTRODUCTION

1.1 INTRODUCTION AND STATED PURPOSE

Veolia ES Technical Solutions, L.L.C. (Veolia), a subsidiary of Veolia Environmental Services North America, L.L.C., is submitting its Toxic Substances Control Act (TSCA) Section 6(e) PCB Commercial Storage and Processing facility renewal application. The facility is located at 5736 West Jefferson Street in Phoenix, Arizona. This application and supporting documentation has been compiled for the U.S. Environmental Protection Agency (EPA), Region IX, in accordance with the requirements of 40 CFR 761, Subpart D. Veolia requests a renewal of its permit for the storage for disposal of PCBs at concentrations of 50 parts per million (ppm) or greater and PCB Items with PCB concentrations of 50 ppm or greater, and for the recovery of metals from specific PCB Equipment. The total storage capacity sought under this application is 218 yd³ (approximately 44,190 liquid gallons).

Veolia manages the manifesting, transportation, receipt, storage, decontamination, recycling, disposal, and recordkeeping for PCB and PCB-contaminated equipment at its Phoenix, Arizona, facility including the recovery and decontamination of metals for off-site shipment and subsequent recycling. Specifically, Veolia stores PCBs and PCB items, and processes PCB equipment. Processing of PCB equipment consists primarily of taking the equipment apart and separating PCB liquids from PCB solids, then managing the off-site disposal of PCB liquids and solids, and facilitating the recovery of those metals that are able to be decontaminated in accordance with TSCA requirements. Site activities are presented in Table 3-2, Summary of PCB Activities. Activities specifically not conducted at the site includes: the disposal of PCBs, the unpermitted outdoor storage of PCBs, and the disassembly and recovery of metals from lighting ballasts.

Additionally, Veolia manages a lamp and mercury-containing manufactured article (MCMA) recycling and retort operation within Building 1 of the facility complex (5752 West Jefferson Street). RCRA-related processes are conducted within Building 1, and storage of mercury-containing wastes is done in both Building 1 and in the Hazardous Waste storage building located north of Building 1. The RCRA-related activities are not the subject of this permit renewal application.

A TSCA Approval Renewal Application review checklist, as prepared by EPA Region IX, is provided as Appendix A to this renewal application.

1.2 CERTIFICATION STATEMENTS

By signing under Section 1.2 below, the signatory is certifying the truth and accuracy of the application and the closure cost estimate, as well as compliance with facility design standards.

Certification of Truth and Accuracy

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Certification of Compliance with Facility Storage Standards

In accordance with 40 CFR § 761.65(d)(2)(iii) and (3)(vii) of TSCA, the owner or operator of the facility must certify compliance with the requirements for storage [40 CFR 761.65(b) and (c)(7)]. The following certification is prescribed in 40 CFR 761.3:

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete. I certify that the Veolia ES Technical Solutions LLC facility located at 5736 West Jefferson Street, Phoenix, Arizona is in compliance with the storage facility standards for PCBs specified at 40 CFR 761.65(b) and 761.65(c)(7).

Closure Cost Estimate Certification

Consistent with 40 CFR 761.65(f)(1), the cost estimate must be certified by the person who prepared the estimate. The cost estimate certification is worded as defined in 40CFR761.3 and is as follows:

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

Print Name and Title, _____

Signature and Date, _____

1.3 SUMMARY TABLE OF PCB UNITS

A table containing a listing of PCB and PCB-contaminated units covered under this permit is provided on the next page.

1.4 REGULATORY CONTACT INFORMATION

The EPA Region IX contact for PCB-related activities is:

Cynthia Ruelas, Project Manager
Land Division/Permits Office (LND-4-2)
US EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105-3920
(415) 972-3329 (phone)
(415) 947-3533 (fax)
Ruelas.cynthia@epa.gov

TABLE 1-1: SUMMARY OF REGULATED PCB UNITS

Bldg No.	Type of Unit	Unit Description	Unit Dimensions	Unit Storage Design Capacity (cubic yards)¹	Site Unit Location	Other Units
2	Building 2 Pod	Drums, Totes, Cubic Yard Boxes, Bins or Equipment Storage	72.33' x 10.33' x 10" high	41.59 cubic yards	Building 2	8,400 gallons
	Building 2 Curbed Area	Drums, Totes, or Cubic Yard Box Storage	19.75' x 24.58' x 0.625' high	20.79 cubic yards	Building 2	4,200 gallons
3	Building 3	Drums, Bins, Cubic Yard Boxes, Totes, or Equipment Storage	Area totaling 5,432.75 square feet with 6-inch high containment curb	228.76 cubic yards	Building 3	46,200 gallons
4	Building 4 Pod	Drums, Bins, or Cubic Yard Box Storage	28.16' x 8.66' x 0.83' high	16 cubic yards	Building 4	3,232 gallons

¹ The highest volume of either drums or totes for each storage area, as calculated in Appendix C of the TSCA renewal application, was used as the basis for the design volume.



2.0 QUALIFICATIONS

The following sections discuss Veolia's qualifications to manage a PCB Commercial Storage facility.

2.1 PERSONNEL RESOURCES

VES employs approximately 55 people at its Phoenix facility. Approximately 45 are employed in the facility's production work force including supervisory, clerical and data processing staff, equipment operators, mechanics, and general laborers. An additional 10 people work within the transportation area, including a staff of drivers.

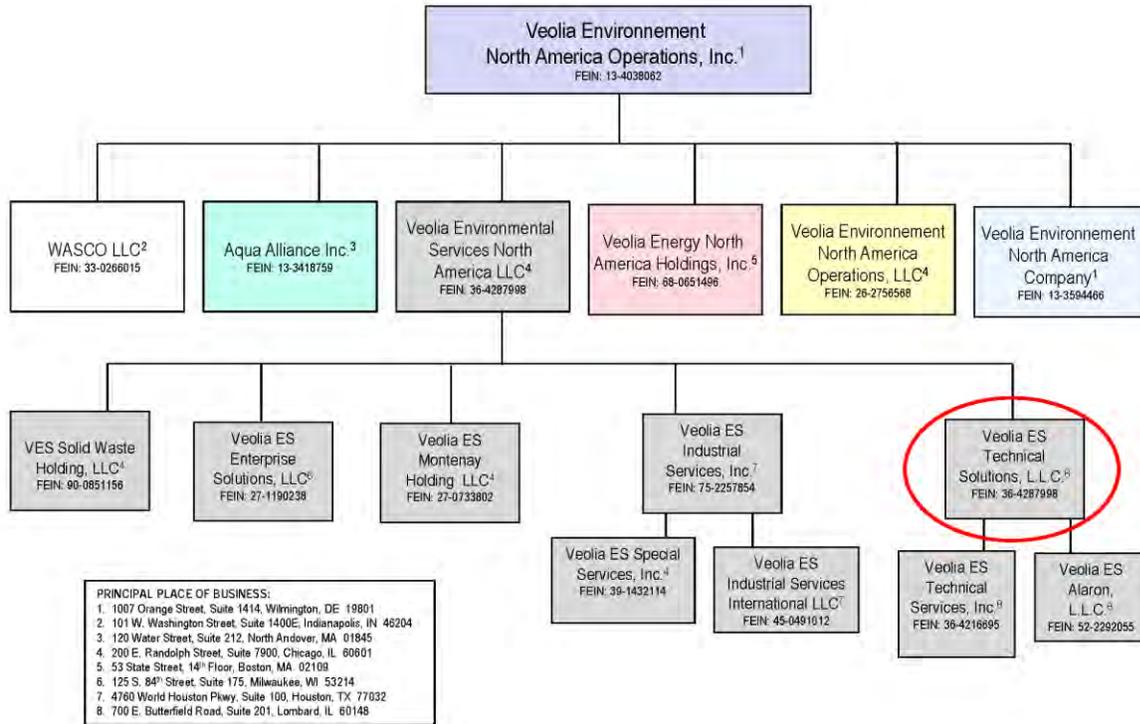
All personnel that work with PCBs and PCB materials receive comprehensive training with regular updates on health and safety procedures associated with the management of PCBs and PCB materials. Management personnel are aware of Veolia's commitment to personal safety and regulatory compliance.

2.1.1 Owner/Operator

Veolia Environmental Services Technical Solutions L.L.C., (VES-TS, a subsidiary of Veolia Environmental Services North America, L.L.C. (VESNA), is a division of Veolia Environment North America Operations, Inc. (VE-NYSE). Veolia ES Technical Solutions, L.L.C. (herein "Veolia") located in Phoenix, Arizona, is a subsidiary of VES-NA, and is the subject of this permit renewal application (see Veolia Environnement Organization Chart). The original Toxic Substances Control Act (TSCA) approval to store and manage PCB and PCB-contaminated wastes was issued by the EPA in 1994.

Veolia manages the manifesting, transportation, receipt, storage, decontamination, recycling, disposal, and recordkeeping for PCB and PCB-contaminated equipment at its Phoenix, Arizona, facility. The qualifications of Veolia and its parent company, VESNA, combined with its diligent compliance-based efforts are supportive of its ability to continue to engage in the storage of PCB-contaminated and PCB materials and equipment while protecting human health and the environment.

Veolia Environnement Organizational Chart



2.1.2 Responsible Person

The person responsible for overall operations at the facility is Mr. James Harrison, Operations Manager. The supervisory employees supporting Mr. Harrison include the following:

- Wayne Bulsiewicz – EHS Manager
- Michael Bomgardner – Transportation Manager
- Kevin Shaver – Branch General Manager

Key corporate personnel supporting Mr. Harrison include:

- Mike Richter – Vice President Special Hazards and Process Safety
- Tom Baker – Director, Environment & Transportation

Resumes for key personnel are included in Appendix B of this renewal application.

2.2 CHRONOLOGY

Salesco Systems USA, Inc. – AZ (“Salesco”) initiated waste reduction and recycling activities at the Phoenix, Arizona location in 1991. In November 1998, Salesco began decontaminating PCB-contaminated and PCB transformers and other electrical equipment. In May 2000, the assets of Salesco Systems USA Inc. – AZ were purchased by Superior Special Services, Inc., a Vivendi Environment company. On January 1, 2003, the organization officially changed its name to Onyx Special Services, Inc. (OSS). On January 1, 2005, ownership was transferred from OSS to Onyx Environmental Services, LLC (OES). On July 1, 2006 the organization officially changed its name to Veolia ES Technical Solutions (Veolia).

Salesco was issued the initial TSCA PCB Commercial Storage approval for the facility operations in 1994. Salesco submitted its TSCA PCB Commercial Storage renewal application in December 1999. OSS submitted a subsequent renewal application in September 2001, April 2003, April 2004, and October 2005. Most recently, Veolia submitted a renewal application in June 2009, April 2011, and April 2013 and is submitting the revised renewal application presented herein.

The following is a chronology of ownership, operations and activities since 1991:

TABLE 2-1: COMPANY CHRONOLOGY

Dates	Name of Operator	EPA ID	Activities
Oct 1991 - May 2000	Salesco Systems USA, Inc. – AZ	AZD983473539	TSCA
May 2000 – Nov 2001	Superior Special Services, Inc.	AZD983473539 and AZ0000337360	TSCA (AZD) and RCRA (AZ0)
Nov 2001 – Jan 2003	Superior Special Services, Inc.	AZ0000337360	TSCA and RCRA
Jan 2003 – Dec 2004	Onyx Special Services, Inc.	AZ0000337360	TSCA and RCRA
Jan 2005 – Jul 2006	Onyx Environmental Services, L.L.C.	AZ0000337360	TSCA and RCRA
Jul 2006 – present	Veolia ES Technical Solutions, L.L.C.	AZ0000337360	TSCA and RCRA

2.3 VIOLATIONS

In accordance with 40 CFR 761.65(d)(3)(iv), the following table includes a listing of alleged environmental violations and notices of violation that resulted in either a civil penalty, judgment or conviction issued in the past 5 years.

TABLE 2-2: VIOLATIONS AND NOTICES

Date	Name of Operator	Type	Allegation	Agency	Status
March 2008	Veolia ES Technical Solutions	NOC	Broken lamp observed to be stored in unlabeled container	ADEQ/EPA	Closed
Nov 2009	Veolia ES Technical Solutions	NOV	NOV has been settled and penalty paid.	ADEQ	Closed
June 2010	Veolia ES Technical Solutions	NOV	NOV has been settled and penalty paid.	ADEQ	Closed
April 2011	Veolia ES Technical Solutions	NOV	NOV has been settled and penalty paid.	EPA	Closed
November 2013	Veolia ES Technical Solutions	NOV	NOV has been settled and penalty paid.	ADEQ	Closed

NOV – Notice of Violation; NOC – Notice of Opportunity to Correct

2.4 ADEQUACY OF FACILITY OPERATIONS

Veolia is dedicated to protecting the environment as well as the health and safety of its employees, and has established a comprehensive program to achieve these goals. Veolia’s health and safety program is comprised of four major disciplines – OSHA 24-hour training, OSHA first-responder training, Hazard Communication training and General Safety Awareness training. Each component is designed to address certain health and safety issues and to assure that the overall program is both comprehensive and effective. For workers who are assigned to PCB processing areas, they undergo a TSCA orientation class. The orientation consists of general safety, hazardous communications, working with PCBs, PPE requirements, and information on the health effects of PCBs. The training program is outlined as an attachment to Appendix D, Facility Operating Plan.

With regard to protection of the environment, Veolia conducts its day-to-day operations in a manner that is consistent with established regulatory protocols including training of personnel, routine inspections, the implementation of standard operating procedures, the incorporation of facility design standards, reporting and recordkeeping requirements. A complete listing of recordkeeping and reporting requirements are provided as Tables 1 and 2 in the facility operating plan.

Veolia has the personnel resources and the appropriate environmental, health, and safety infrastructure developed and implemented such that the operation of the storage facility will not pose an unreasonable risk of injury to health or the environment.

3.0 COMMERCIAL STORAGE FACILITY

3.1 LOCATION

The Veolia facility is located at approximately -112°11'06" west longitude and 33°26'47" north latitude in the southwest quarter of the northwest quarter of Section 8, Township 1 North, Range 2 East of the Gila and Salt River Base and Meridian. The facility address is 5736 West Jefferson Street in Phoenix, Arizona 85043. The 5700 block of West Jefferson is located approximately 6 miles west of downtown Phoenix and approximately 1 mile south of Interstate 10 (I-10). The Veolia facility is located within the following jurisdictions:

- City of Phoenix
- Maricopa County
- State of Arizona
- EPA Region IX
- United States of America

Figure 1 shows the site layout and surrounding area. Figure 2 is a topographic map of the immediate vicinity. Figure 3 locates the facility with regard to the nearest 100-year floodplain. Figures 4 through 7 include more detailed site plans showing the locations of PCB storage and processing activities, as well as site drainage characteristics. Figure 4 is the historic facility configuration, which was recently modified to reflect the future operational configuration depicted in Figure 5, and labeled as the “proposed” facility configuration.

The facility began present operations in October 1991 and is located within the Westgate Industrial Center, which was developed from 1984 to 1986. The buildings are owned by Jewel Investment Company of Phoenix, Arizona. Jewel Investments has owned the property since 1994. Veolia is currently leasing the facility on a month-to-month basis.

Prior to development, the site was used for agricultural purposes for many years. The area surrounding the facility has been developed in recent years and is currently used primarily for industrial, manufacturing, and distribution purposes. The site is currently zoned A-1, Light Industrial District, by the City of Phoenix.

The Veolia facility is located on a 2.67 acre (79,800 ft²) parcel within the industrial park. The buildings, numbered 1, 2, 3, and 4, are 8,336 ft², 8,036 ft², 8,336 ft², and 8,036 ft², respectively (a total of 33,344 ft²). The facility, as shown in Figures 1 and 4, is completely enclosed by exterior building walls, masonry block walls, or chain link gates. The masonry walls are topped with

barbed wire. The buildings are locked during non-operating hours and are equipped with security systems. As the activities conducted in Building 1 are permitted under Arizona Department of Environmental Quality (ADEQ) authority and do not include PCB activities, it is discussed only minimally throughout this application.

Access to the site is gained by traveling east on Jefferson Street approximately 200 yards from 59th Avenue. Truck traffic enters the facility via Jefferson Street. Each building is equipped with exterior truck wells to facilitate loading and unloading of trucks. Trucks arriving at the site back into a designated truck well and leave the site by pulling straight out. Operational traffic from on-site forklifts occurs between all buildings to the north of the berms shown in Figure 4.

3.2 HOURS OF OPERATION

The Veolia facility typically operates 5 days per week, and runs one shift per day. The facility most often operates Monday through Friday from 5:00 a.m. to 1:30 p.m. On an as-needed basis, the facility may operate an additional one day per week (typically Saturday) and/or may add a second shift to accommodate storage and/or processing needs.

3.3 GENERAL LAYOUT

The Veolia complex consists of four one-story buildings with each unit containing an office area and a warehousing area. PCB-related activities are conducted in Buildings 2 and 3, and Building 4.

Please refer to Table 3-1 for a breakdown on facility utilization.

3.3.1 Building 1

As the Veolia Building 1 is currently permitted under the Resource Conservation and Recovery Act (RCRA) as a TSDF, and is under the regulatory jurisdiction of ADEQ, it is minimally discussed in this application.

3.3.2 Buildings 2 and 3

Under this permit application, Building 2 is dedicated to the inbound receipt and storage of PCBs and non PCB items.

Building 3 is dedicated to inbound receipt, storage and processing of PCBs and PCB items. Building 3 formerly was used to conduct the processing (disassembly) of PCB ballasts. Ballast processing initially commenced in 1994; however, this activity is no longer performed at Veolia . Currently, ballasts are received, sorted, and shipped off-site for disposal. Additional details of processing activities are further discussed in the Facility Operating Plan (Appendix D).

3.3.3 Building 4

Currently, a small portion of Building 4 is dedicated to the storage of PCB materials.

3.4 ENVIRONMENTAL CONDITIONS

The site is graded in such a manner that off-site run-on is minimized and on-site run-off does not occur. The facility is surrounded by masonry block wall to the north, west, and east and Jefferson Street is located to the south. Figure 4 includes directional arrows that indicated site drainage patterns. Storm water from landscape and employee/visitor parking areas is drained by three drywells as allowed under ADEQ rules. Eight additional drywells located within the fenced areas between buildings or in truck wells have been sealed to prevent discharge to the wells. These drywells were installed at the time the facility was constructed, presumably during the 1991-1992 timeframe. The best management plan for storm water included capping these wells so that they would not receive any storm water. Storm water is allowed to collect in low-lying areas towards the north-side of the property and then is removed by mechanical means or allowed to evaporate. It is known from past experience (i.e., following heavy rainfalls that required pumping of the yard area) that the retention capacity of the yard area is approximately 30,000 gallons. Remaining site drywells (i.e., the three drywells that drain the employee/visitor parking areas along the south side of the facility) are registered with the ADEQ as required by Arizona Regulations.

The facility is located in the arid desert region of the southwest United States. Annual rainfall is approximately 7.66 inches while average annual pan evaporation rates approach 80 inches. There are no natural surface waters or wetlands in the vicinity of the site. The Roosevelt Irrigation District Canal is located approximately one mile south of the facility. The canal is protected from adjacent surface run-on by a levee system (see Figure 2).

Several registered wells exist in the vicinity of the site. The closest high capacity water well is approximately 0.25 of a mile northeast of the site. The well is registered to the Roosevelt Irrigation District, and the water is used for irrigation purposes. Other wells in the vicinity of the site used for water production purposes. Depth to groundwater in the area is approximately 100 feet below grade. Because operational activities are performed in facility buildings and materials are stored within steel containment systems, groundwater contamination from the facility is unlikely.

The area surrounding the site is zoned A-1, Light Industrial. The area was historically used for agricultural purposes; however, it was developed for industrial purposes in the late 1980's through the present day. Land uses in the site vicinity include agricultural, industrial,

manufacturing, and vacant properties. Because of current operational practices, site grading, low annual rainfall, and facility design, impact to surrounding properties is unlikely.

3.5 FACILITY DESIGN STANDARDS

Consistent with the standards prescribed in 40 CFR 761.65(b), information pertaining to the facility design of Buildings 2, 3, and 4 must be included as part of the application package for approval as a commercial storage facility for PCB waste. The following sections describe the design and construction standards of the facility. The facility must be in compliance with the requirements of 40 CFR 761.65(b).

3.5.1 Roofs and Walls

The facility structures must have roofs and walls that prevent rain from reaching areas where PCBs and PCB items are stored, 40 CFR 761.65(b)(1)(i). The buildings are constructed of concrete masonry block exterior and separating walls. The separating wall between connecting buildings is a 30-inch thick parapet wall with a 3-hour fire rating and no openings. The roofs consist of plywood-web truss-joints framed into glulam beams that are supported on exterior walls, the separating wall, and interior steel post columns. The roofs are constructed of plywood deck with built-up Class B roofing. The clear interior height is 16 feet. The facility buildings were constructed in 1986 and conform to all applicable building code requirements.

The roof and wall construction of the facility is more than adequate to prevent rain from contacting stored material.

3.5.2 Flooring and Floor Drains

The facility must have an adequate floor that has continuous curbing with a minimum 6 inch high curb. The floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container or 25 percent of the total internal volume of all PCB Articles or PCB Containers stored there, whichever is greater; No drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area; Floors and curbing constructed of Portland cement, concrete, or a continuous, smooth, non-porous surface as defined at §761.3, which prevents or minimizes penetration of PCBs, 40 CFR 761.65(b)(1)(ii)-(iv).

The building floors are cast-in-place concrete slabs (Portland Type-II) providing a smooth, continuous, non-porous surface as defined at §761.3, which prevents or minimizes the penetration of PCBs. These floors are sealed. Materials are not stored directly on any concrete surfaces. Materials are to be stored in steel pods or within PCB designated areas with bermed and sealed floors. Safety Data Sheets (SDSs) for the floor coating are provided in Appendix G.

Procedures are in place to ensure PCBs are not tracked or accidentally transferred to other operational areas; see the Facility Operating Plan for SOPs regarding the tracking of PCBs, and quarterly wipe sampling for work areas.

The facility utilizes fabricated steel containment pods or permitted storage areas in which to store material. The permitted storage pod used as secondary containment is constructed of 110-inch steel channel with 2 1/2-inch flanges continuously welded to 3/16-inch hot rolled steel plate. Welded seams are tested at the time of fabrication and visually inspected on a routine basis to ensure their integrity. The permitted secondary containment pod is affixed with a minimum 6-inch high curbing. Construction details are shown in Figure 9. The steel pod lies directly on the concrete floor and provide a non-porous and impervious surface for containment. A pod or steel plate of questionable integrity is removed from service, inspected and repaired, or replaced.

Containment is addressed in section 3.5.4 of the application and meets the requirements of 40 CFR 761.65(b)(1)(ii) in that the floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container or 25 percent of the total internal volume of all PCB Articles or PCB Containers stored there, whichever is greater.

Floor drains, sanitary sewer discharges, or other types of collection lines that could contaminate sewers and sewage treatment plants do not exist in the areas where storage or processing occurs. A Standard Operating Procedure (SOP) has been developed for the transfer of fluids and is included in the Facility Operating Plan.

3.5.3 Floodplains

As defined by 40 CFR 761.65(b)(1)(v), facilities storing PCBs or PCB articles must not be located at a site that is below the 100-year flood water elevation.

Based on the current Flood Insurance Rate Maps (FIRM), the site is not located within the 100-year floodplain. The Federal Emergency Management Agency (FEMA) develops FIRMs, which define the limits of a 100-year floodplain in areas of interest. The current FIRM for the Veolia facility (Map No. 04013C2185L; dated October 16, 2013) indicates that the site is located within Zone B, which is defined as areas between the limits of the 100-year floodplain and the limits for the 500-year floodplain. The vicinity of the site and the floodplain designation is shown in Figure 3.

3.5.4 Containment Calculations

As defined in 40 CFR 761.65(b)(1)(ii), the floor and curbing must provide a containment volume equal to at least two times the internal volume of the largest PCB Article or PCB Container or 25 percent of the total internal volume of all PCB Articles or PCB Containers stored there, whichever is greater.

Containment calculations are provided in Appendix C to this application to demonstrate the facility compliance with 40 CFR 761.65(b)(1)(ii).

3.5.5 Design Capacity

This section discusses the design capacity of the facility. The design capacity is the volume that is available for PCB storage (i.e., the areas that meet the design standards prescribed under 40 CFR 61.65(b)). The permitted storage capacity is the volume of storage for which Veolia is seeking a permit under this Application. The permitted storage capacity must be equal to or less than the design capacity; this means that the volume of the facility meeting the design standards at 40 CFR 761.65(b) is sufficient to manage the volume of regulated PCB items to be stored in that location.

The facility design capacity is 307 cubic yards based upon the available PCB storage capacity as demonstrated in Appendix C and as detailed in Table 1-1. This includes storage areas within buildings 2, 3 and 4. However, the permitted capacity requested is 218 cubic yards. A demonstration that sufficient containment capacity exists to store the maximum estimated inventory has been calculated in Appendix C and in accordance with 40 CFR 761.65(d)(2)(ii). In conjunction with the storage inventory, a basic facility utilization table is provided. Residual square footage is dedicated towards non-regulated activities such as office space and logistical support. In addition, and with regard to Building 2, additional square footage is also used to receive and store non-PCB items. A facility plan, showing the current facility layout, is provided as Figure 4. An updated layout of Building 4 is presented in Figure 5.

TABLE 3-1: FACILITY UTILIZATION

Total Facility Area = 79,800 ft ² (including yard area)	Facility Area Breakdown
Building 2	8,036 ft ² total; approximately 6,000 ft ² for warehouse activities and approximately 2,000 ft ² for office space <ul style="list-style-type: none"> • 747 ft² for PCB storage (square footage of pod in building) • 485 ft² for PCB storage (square footage of sealed curbed area in building)
Building 3	8,336 ft ² total; approximately 7,500 ft ² for warehouse activities and approximately 800 ft ² for office space and employee break area <ul style="list-style-type: none"> • 7,500 ft² for processing ,storage, transfer aisles and change areas, of which 5,431.75 ft² is for processing and storage
Building 4	8,036 ft ² total; approximately 6,000 ft ² for warehouse activities and approximately 2,000 ft ² for office space <ul style="list-style-type: none"> • 243.87 ft² used as PCB storage

The Veolia facility utilizes fabricated steel containment pods, sealed and dedicated PCB equipment storage and processing areas (Buildings 2, 3 and 4), in which to store material. The construction of the pods is described in detail in Section 3 and a containment detail is provided as Figure 9. The construction of the PCB equipment management area is also described in Appendix D, Facility Operating Plan. Material is contained within UN or DOT approved containers, and the containers are placed within the containment pods (herein “pods”) or the PCB equipment management area. Container storage within the PCB designated areas is configured such that there is adequate aisle space to allow access for inspection and such that there is adequate containment based upon the volume of liquid stored within the containment. Any pods used within the process areas are not included in the calculations for determining the total storage capacity of the facility, but were included in closure plan calculations. The dimensions, capacities and uses of each pod are provided in Appendix C and are further discussed in Section 4.0. Calculation methodology and actual calculation tables are provided in Appendix C.

3.5.6 Fire Suppression Systems

The facility is not equipped with an automatic fire suppression system, nor is it required to be equipped with such a system in accordance with the regulations presented at 40 CFR 761 or in accordance with local zoning and fire code requirements. However, the facility is equipped with manual fire suppression systems (e.g., fire extinguishers) which are appropriate based upon City of Phoenix Fire Department inspections of the facility.

3.6 FACILITY OPERATING PLAN

Veolia has developed a facility operating plan that addresses area activities. This plan is provided as Appendix D to this Application and includes waste acceptance procedures, storage protocols (including storage of materials for outbound shipment), processing procedures, a discussion on

the management of movable equipment, and a discussion related to on-site tanks, outdoor storage of materials, and facility marking requirements. The operating plan is applicable to the storage for disposal of PCBs at concentrations of 50 ppm or greater and PCB Items with PCB concentrations at 50 ppm or greater.

The Veolia Spill Prevention Control and Countermeasures (SPCC) Plan is provided within Appendix D to this Application, as an attachment to the Operations Plan. The Bar Coding system is also presented in Appendix D.

A listing of the proposed PCB site activities is provided in the left-hand column of Table 3-2; the balance of the table provides the associated regulatory requirements for the storage and ultimate disposition of those materials and material components.

TABLE 3-2: SUMMARY OF PCB ACTIVITIES AND ASSOCIATED REGULATORY REQUIREMENTS

Summary of Site PCB Activities	STORE 761.65	SORT 761.65	DRAIN 761.60	DECON 761.79	RECYCLE 761.79	INCINERATE 761.70	LANDFILL 761.75	STORAGE
Ballasts 761.60(b)(6)	761.60(b)(6)(iii) 761.65	761.65	NA	NA	NA	761.60(b)(6)(i)(A)	761.60(b)(6)(i)(B)	BLD 2, 3, 4
CABLE ≥50-499 761.60(b)	761.60(b)(7) 761.65 Exempt from storage reqts if drained per 761.60(b)(6)(ii)(B)	761.65	761.60(b)(6)(ii)(A) [managed as "other PCB Articles"]	761.79(b)(3)(i) and (ii) [Note: stds for restricted and unrestricted use]	761.60(b)(6)(ii)(A)(1)	761.60(b)(6)(ii)(A)(4)	761.60(b)(6)(ii)(A)(4)	BLD 2, 3, 4
CABLE ≥ 500	761.60(b)(7) 761.65	761.65	761.60(b)(6)(i) [managed as "other PCB Articles"]	761.79(b)(3)	761.79(b)(3)	761.60(b)(6)(i)(A)	761.60(b)(6)(i)(B)	BLD 2, 3, 4
CAPACITORS ≥50-499	761.60(b)(7) 761.65	761.65	NA	NA	NA	761.60(b)(4)	761.60(b)(4)	BLD 2 –3
CAPACITORS ≥ 500 761.60(b)(2)(iii)	761.60(b)(7) 761.65	761.65	NA	NA	NA	761.60(b)(2)(iii)(A)	NA per 761.60(b)(2)(iii)(B) [landfill no longer an option after 3/1/81]	BLD 2 –3
TRANSFORMERS ≥50-499 761.60(b)(6)(ii)	761.60(b)(7) 761.65 Exempt from storage req'mts if drained per 761.60(b)(6)(ii)(B)	761.65	761.60(b)(6)(ii)(A)	761.79(b)(3)(i) and (ii) [Note: stds for restricted and unrestricted use]	761.60(b)(6)(ii)(A)(1)	761.60(b)(6)(ii)(A)(4)	761.60(b)(6)(ii)(A)(4)	BLD 2 –3
TRANSFORMERS ≥ 500 761.60(b)(1)	761.60(b)(7) 761.65	761.65	761.60(b)(1)(i)	NA	NA	761.60(b)(1)(i)(A)	761.60(b)(1)(i)(B) [requires 18 hr soak]	BLD 2 –3
BUSHINGS ≥50-499	761.60(b)(7) 761.65 Exempt from storage req'mts if drained per 761.60(b)(6)(ii)(B)	761.65	761.60(b)(6)(ii)(A) [managed as "other PCB Articles"]	761.79(b)(3)(i) and (ii) [Note: stds for restricted and unrestricted use]	761.60(b)(6)(ii)(A)(1)	761.60(b)(6)(ii)(A)(4)	761.60(b)(6)(ii)(A)(4)	BLD 2 –3
BUSHINGS ≥ 500	761.60(b)(7) 761.65	761.65	761.60(b)(6)(i) [managed as "other PCB Articles"]	761.79(b)(3)	761.79(b)(3)	761.60(b)(6)(i)(A)	761.60(b)(6)(i)(B)	BLD 2 –3

Summary of Site PCB Activities	STORE 761.65	SORT 761.65	DRAIN 761.60	DECON 761.79	RECYCLE 761.79	INCINERATE 761.70	LANDFILL 761.75	STORAGE
OIL 761.60(a)	761.65	NA	NA	NA	NA	761.60(a) 761.70	NA	BLD 2 –3
Hydraulic Machines 761.60(b)(3)	Not reviewed; not managed at site; see 761.60(b)(3)	Not reviewed; not managed at site; see 761.60(b) (3)	Not reviewed; not managed at site; see 761.60(b)(3)	Not reviewed; not managed at site; see 761.60(b)(3)	Not reviewed; see 761.60(b)(3)	Not reviewed; see 761.60(b)(3)	Not reviewed; see 761.60(b)(3)	NA
Movable Equipment	NA; managed as PCB Article if decon is unsuccessful	NA	NA	761.79(c)(2) [must double-wash/ rinse or swab surface]	NA	NA	NA	NA
PCB Containers (≥ 500 ppm)	761.65	NA	NA	761.79(c)(1) [must triple rinse with solvent that is <50 ppm PCB]	NA	761.60(c)(1)(i) [unless decontaminated in accordance with 761.79]	761.60(c)(1)(ii) [unless decontaminated in accordance with 761.79]	BLD 2, 3, 4
PCB Containers (< 500 ppm)	761.65	NA	Must be drained prior to disposal if MSW landfill option is used	NA	NA	Municipal solid waste [per 761.60(c)(2)]	Municipal solid waste [per 761.60(c)(2)]	BLD 2, 3, 4

4.0 CLOSURE PLANNING

The Facility Closure Plan documents the procedures and cost estimates associated with the cleanup, decontamination, and closure of the Veolia facility at 5736 West Jefferson Street in Phoenix, Arizona. The Closure Plan is based upon the estimate costs to dispose of regulated PCB Items that may be in storage at the time of closure and to close the regulated PCB storage units (Table 1-1, Summary of Regulated PCB Units, and Table 3-1, Facility Utilization) of this application.

The Closure Plan includes those elements required in accordance with 40 CFR 761.65(e), (f), and (g) including the Closure Plan, Closure Schedule, Closure Cost Estimate, and Financial Assurance information.

The Closure Plan is provided as Appendix E of this Application and includes four attachments: a Health and Safety Plan (HASP) to be revised and executed at the time of Closure, a Sampling Analysis Plan (SAP), a Closure Cost Estimate, and a Financial Assurance Mechanism.