UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic and U.S. Postal Service Mail

DEC 05 2014

Mr. Russell P. Cepko
President
Environmental Projects
CBS Corporation
20 Stanwix Street, 10th Floor
Pittsburgh, PA 15222

Subject: U.S. EPA Region 9 Approval Under Toxic Substances Control Act Polychlorinated Biphenyls for Former Westinghouse Facility Rancho Dominguez, Compton, California

Dear Mr. Russell P. Cepko:

Enclosed is the U.S. Environmental Protection Agency Region 9's (EPA's) approval with conditions (Approval) of the *"Building Cleaning and Sampling Work Plan Former Westinghouse Apparatus Repair Plant Rancho Dominguez, California,"* dated February 20, 2014 (Work Plan), as amended by CBS.[1] EPA is issuing the Approval under the Toxic Substances Control Act regulations for polychlorinated biphenyls in 40 CFR 761.61(c) (risk-based cleanup application). In general, EPA's Approval requires cleanup of PCBs at the former Westinghouse Apparatus Repair Plant (Facility) and in the Facility's former operations building (Building) at Rancho Dominguez, Compton, California.

Westinghouse Electric Corporation, which later became CBS, operated the Facility as an electrical apparatus service and repair center where it handled and managed PCBs. The Facility was subsequently sold to Pacific Industrial Partners, LLC (PIP) and Cline Industrial Holdings, LLC (CIH). The Building is contaminated with PCBs[2]. Tenants currently occupy the Building and have occupied this structure for several years. Therefore, EPA is issuing the enclosed Approval jointly to CBS, PIP, and CIH (collectively, the Parties).

The key purposes of this Approval are to (1) assure the tenants are not and will not incur unreasonable risks[3] from potential exposure to PCBs in the Building, (2) assure the Parties achieve

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[1] After reviewing the Work Plan, EPA determined it was incomplete and requested additional information. CBS provided additional information that amended the Work Plan via its March 21, 2014 and April 1, 10, and 25, 2014 email messages. The amended Work Plan is the Application.

[2] CBS has conducted some level of PCB characterization inside the Building. Limited preliminary bulk dust samples collected inside the Building range from 18 to 112 mg/kg total PCBs.

[3] To meet that TSCA standard, EPA's cleanup must be protective of human health and the environment. EPA applies its acceptable cancer risk range of 10^{-6} to 10^{-4} and a non-cancer hazard quotient (HQ) of 1 to its cleanup decisions.

compliance with the TSCA use authorization for decontaminated materials in 40 CFR 761.30(u)(1), and (3) facilitate the collection of data for EPA's use in making the no unreasonable risk determination required in 40 CFR 761.61(c). The cited use authorization establishes that structures contaminated with PCBs may be used if cleaned up consistent with 40 CFR 761 Subpart D (inclusive of 40 CFR 761.61(c)).

The Application describes and proposes work to be conducted inside the Building. Such work includes sampling of dust (bulk and surfaces wipes), air, and sediments from interior Building drains before pre-characterization cleaning[4]; air sampling during and after pre-characterization cleaning; pre-characterization cleaning; and additional characterization of PCBs in the Building. In addition, the Application states that a final notification and cleanup plan will be submitted to EPA after the work described in the Application is completed.

This Approval modifies and expands the scope of the work proposed in the Application. EPA refers to this new scope of work as the Phase 1 PCB Cleanup Work (Phase 1 Work). The following are highlights of conditions of approval to be implemented by the Parties as part of the Phase 1 Work:

- Risk evaluations to be conducted before and after Building cleaning.
- Additional number and location of air samples to be proposed for EPA approval and to be conducted before, during, and after Building cleaning.
- Submission of an Application amendment covering cleanup of PCBs in the Building, cleanup verification samples, post-cleanup air and dust (wipe, and if applicable, also bulk) samples, and a post-cleanup risk evaluation.

The Approval also requires the Parties to submit a separate Application amendment for the Phase 2 PCB Cleanup Work to cover additional characterization and cleanup of PCBs within the Facility and adjacent areas to where PCBs may have migrated. Soils contaminated with PCBs are present at and beyond the Facility and that contamination is subject to TSCA requirements in 40 CFR 761.

At present, EPA is not able to make the no unreasonable risk determination required in 40 CFR 761.61(c) due to lack of information. EPA will make that determination when it approves the future Application amendment addressing cleanup of PCBs in the Building.

[4] CBS has conducted some level of characterization inside the Building for PCBs.

We look forward to assisting the Parties on the PCB cleanup at the former Westinghouse Facility. If you have questions about this Approval, please contact Carmen D. Santos at 415.972.3360 or via email at santos.carmen@epa.gov.

Sincerely,

Jeff Scott, Director
Land Division

Enclosure

Cc: Mr. William D. Wall, CBS Senior Counsel
william.wall@cbs.com

Mr. Leo M. Brausch, CBS Consultant
lbrausch@consolidated.net

Phil Chandler, DTSC
Phil.Chandler@dtsc.ca.gov

Robert Krugg, DTSC
Robert.Krug@dtsc.ca.gov

U.S. Environmental Protection Agency Region 9
Conditional TSCA PCB Cleanup Approval Under 40 CFR 761.61(c)

Former Westinghouse Apparatus Repair Plant
Rancho Dominguez, Compton, California

DEC 0 5 2014

A. Introduction

The U.S. Environmental Protection Agency Region 9 (EPA) hereby approves with conditions (Approval) under the Toxic Substances Control Act regulations in 40 CFR 761.61(c) the *"Building Cleaning and Sampling Work Plan Former Westinghouse Apparatus Repair Plant Rancho Dominguez, California"* dated February 20, 2014 (Work Plan) as subsequently amended by CBS.

This Approval applies to the former Westinghouse Apparatus Repair Plant (Property or Facility) including the former operations building, and all areas adjacent to the Facility to where polychlorinated biphenyls (PCBs) may have migrated. The conditions of approval are in Sections D and E, below. This Approval is effective immediately.

This Approval is based on (1) EPA's review of CBS' February 20, 2014 Work Plan[1], (2) EPA's February 25, 2014 Information Request, (3) the February 28, 2014 conference call between CBS and EPA, (4) additional information submitted by CBS on March 21, April 1, April 10, and April 25, 2014 in response to the Information Request, and (5) the TSCA PCB regulations and available related guidance. The additional information submitted by CBS amended the Work Plan. EPA refers to the amended Work Plan as the Application that it had requested in August 2013 for a risk-based cleanup of PCBs under 40 CFR 761.61(c).

B. Implementing Parties, Summary of Approval Conditions, and Purpose of the Approval

1. **Implementing Parties.** Westinghouse Electric Corporation later became CBS and operated the Facility as an electrical apparatus service and repair center where it managed PCBs. The Facility was subsequently sold. Tenants currently occupy the former operations building (Building) within the Facility and have occupied this structure for several years. The Building is contaminated with PCBs.

   Sources of PCB contamination include and may not be limited to electrical equipment (e.g., transformers) repaired and serviced at the Facility that contained PCBs at levels equal to or above 50 milligram/kilogram (mg/kg). In addition, any containers (inclusive of tanks or tank-like structures) at the Facility that may have held liquid PCBs are also sources of PCB contamination.

   Therefore, consistent with the TSCA use authorization in 40 CFR 761.30(u)(1) (Use of decontaminated materials) and cleanup requirements for PCB remediation waste in 40 CFR 761.61(c), EPA is issuing this Approval jointly to CBS as the owner of the Facility at the time of

[1] EPA determined the Work Plan was incomplete and requested additional information.

contamination; and to Pacific Industrial Partners, LLC (PIP), and Cline Industrial Holdings, LLC (CIH) as current owners of the Facility (Owners). CBS, PIP, and CIH are collectively referred to in this Approval as the Parties.

2. **Purpose of Approval.** Key purposes of this Approval are to (1) assure the tenants are not and will not incur unreasonable risks from potential exposure to PCBs in the Building, (2) assure the Parties achieve compliance with the TSCA use authorization in 40 CFR 761.30(u)(1), and (3) facilitate the collection of data for EPA's use in making the no unreasonable risk determination required in 40 CFR 761.61(c).

3. **Summary of Changes to Application.** The Application describes and proposes work to be conducted inside the Building. Such work includes sampling of dust (bulk and surfaces wipes), air, and sediments from interior Building drains before pre-characterization cleaning[2]; air sampling during and after pre-characterization cleaning; pre-characterization cleaning; and additional characterization of PCBs in the Building. In addition, the Application states that a final notification and cleanup plan will be submitted to EPA after the work described in the Application is completed.

   This Approval modifies and expands the scope of the work proposed in the Application. EPA refers to this new scope of work as the Phase 1 PCB Cleanup Work (Phase 1 Work). The following are highlights of conditions of approval to be implemented by the Parties as part of the Phase 1 Work but that have expanded the Application's scope of work:
   - Risk evaluations to be conducted before and after Building cleaning.
   - Additional number and location of air samples to be proposed for EPA approval and to be conducted before, during, and after Building cleaning.
   - Submission of an Application amendment covering cleanup of PCBs in the Building, cleanup verification samples, post-cleanup air and dust (wipe, and if applicable, also bulk) samples, and risk evaluation.

   In addition, the Approval requires the Parties to submit a separate Application amendment for the Phase 2 PCB Cleanup Work (Phase 2 Work) to cover additional characterization and the PCB cleanup within the Facility and adjacent areas to where PCBs may have migrated.

C. Definitions

1. **Property or Facility; Building; and Land Use.** The terms Property and Facility are used interchangeably in this Approval and refer to the entire property where Westinghouse Electric Corporation conducted its operations. The Building is located within and it is part of the Facility. EPA understands that current and anticipated future land uses at and surrounding the Facility are industrial / commercial.

[2] CBS has conducted some level of characterization inside the Building for PCBs.

2. **Owner.** Owner refers to current owners of the Property, Pacific Industrial Partners, LLC (PIP) and Cline Industrial Holdings, LLC (CIH).

3. **PCB Cleanup Site.** The PCB Cleanup Site (PCS) encompasses the entire former Westinghouse Apparatus Repair Plant (Facility or Property) and all adjacent areas to where PCBs may have migrated.

D. General Conditions of Approval – Application and Phase 1 Work

Under 40 CFR 761.61(c), EPA is required to make a determination of no unreasonable risk of injury to health or the environment. EPA will make that determination after the Parties complete the Phase 1 Work requirements specified below. Therefore, this Approval requires that health risk evaluations be conducted to determine the risk resulting from exposure to PCBs by tenants occupying the Building are occurring and if immediate steps must be implemented to reduce such risks. Based on EPA's review of the assessments, EPA will determine if risks are within EPA's acceptable cancer risk range of 10^{-4} to 10^{-6} and equal to or below a hazard quotient of (HQ) 1 for non-cancer effects.

Also, Condition D.4.a requires the Parties to submit an Application amendment to address the PCB cleanup inside the Building as part of the Phase 1 Work. EPA will make the required determination when it approves the Application amendment. Consistent with that action, EPA will modify this Approval.

1. **Risk-based disposal approval.** The Parties must perform and complete all the Phase 1 Work in a manner that is protective of the tenants that occupy the Building. Upon completion of the Phase 1 Work, the Parties must demonstrate that tenants are not incurring and will not incur in the future unreasonable risks. The Parties must demonstrate that residual PCB remediation wastes that may remain in the Building pose no unreasonable risks.

2. **TSCA use authorization in 40 CFR 761.30(u)(1) for continued use.** The Parties must implement the Phase 1 Work to assure compliance with the use authorization. Continued use of the Building is contingent upon the Parties completing the Phase 1 Work. PCB levels in limited bulk dust samples collected inside the Building range from 18 to 112 mg/kg total PCBs.

3. **Phase 1 Work. Preliminary exposure assessment of PCBs inside the Building.**

   In reference to Conditions D.3,a through D.3.c, below, the Parties must conduct the risk evaluations immediately after the laboratory analytical results are validated by a third party not affiliated with CBS and/or the Owners.

   a. **Baseline risk evaluation.** Within 14 days after the Parties receive the pre-cleaning analytical results for air, bulk dust, and wipe samples, the Parties must submit a preliminary or baseline evaluation of the risk of exposure to PCBs by tenants in the Building.

b. **Post-cleaning risk evaluation.** Within 14 days after the Parties receive the analytical results for post-cleaning air, wipe, and bulk dust (if present) samples, the Parties must reassess the baseline risk and make recommendations on next steps to assure that tenants will incur no unreasonable risks; and assure no unreasonable risk of injury to the environment.

c. **Post-PCB cleanup risk evaluation.** Within 14 days after the Parties receive the third party PCB cleanup verification data for the interior of the Building, the Parties must submit a revised tenant risk evaluation for EPA review.

Clarification. EPA may consider the Parties' risk evaluations in determining (1) if additional interim risk reduction measures are necessary and (2) if those measures need immediate implementation for continued use of the Building. Depending on its quality and completeness, the additional characterization data and PCB risk evaluations must be used by the Parties to submit the required Application amendment that covers cleanup of PCBs inside the Building as part of the Phase 1 Work. Also, refer to Condition D.4, below.

4. **Future amendment(s) to the Application. Phase 1 and Phase 2.**

a. **Phase 1 PCB Cleanup Work (Phase 1 Work).** Within 30 days after the Parties complete the additional PCB characterization work in the Building, the Parties must submit an Application amendment for EPA approval. Such amendment must cover the post-characterization cleanup of PCBs in the Building required in this Approval as part of the Phase 1 Work. The Application amendment must include a summary of all pre-cleaning and post-cleaning characterization data collected under the Phase 1 Work and the risk evaluations required in this Approval as part of that work. The Parties must use this information to support their Phase 1 risk-based cleanup plan.

Clarification. Depending on the results of air and wipe samples collected after completion of the post-characterization PCB cleanup inside the Building, additional cleanup and verification sampling inside the Building may be necessary. An inspection of the Building to determine if other PCB sources are present may be necessary. The Application may need to be further amended to address this work.

b. **Modifications to EPA's Phase 1 Work Approval.** EPA may modify this Approval based on additional information that may become available in the future including information that already exists and EPA does not currently have in its possession. In addition, see Condition D.4.a.

c. **Phase 2 PCB Cleanup Work (Phase 2 Work).** Within 60 days after completion of the Phase 1 Work field activities, the Parties must submit for EPA approval an Application amendment that addresses the Phase 2 Work. The Parties may submit a draft amendment for EPA review and request a meeting with EPA to discuss the draft amendment.

At a minimum, the Phase 2 Work must include (1) additional characterization sampling for soils and surfaces within the PCB Cleanup Site (PCS) (inclusive of areas such as the Facility and railroad spur), (2) proposed cleanup levels, (3) cleanup of PCBs within the PCS, (4) post-cleanup verification sampling and comparison of results to cleanup levels, (5) disposal of PCB remediation wastes, (6) Phase 2 Work completion report, and (7) maintenance of all PCB cleanup records.

If necessary, the Phase 2 Work will include the submission of a restrictive land use covenant (LUC) by the Parties for EPA review and approval, recordation of the LUC consistent with state law after approved by EPA, and submission of a copy of the recorded LUC to EPA.

5. **Compliance with this Approval and applicable regulations.** The Parties must comply with all the conditions in this Approval and implement the Application as modified by this Approval.

   This Approval does not relieve the Parties and their consultants from complying with other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Departure from this Approval without prior written permission from EPA may result in revocation of this Approval. If additional information demonstrates that EPA cannot make a no unreasonable risk determination, EPA will modify or revoke this Approval. Nothing in this Approval bars EPA from imposing penalties for violations of this Approval or for violations of other applicable TSCA PCB requirements or for activities not covered in this Approval.

E. Specific Conditions of Approval – Phase 1 Work

1. **Pre-characterization Building cleaning, "temporary decontamination areas," and time frame to complete Building cleaning.** Within seven (7) days after the date of this Approval, the Parties must submit to EPA a description of measures it will take to prevent potential tenant exposure to PCBs during pre-cleaning sampling, pre-characterization Building cleaning activities, and characterization sampling. Such measures must describe the Parties approach to prevent mobilization of PCBs onto areas occupied and/or in use by tenants. In addition, the Parties must submit figures that clearly depict the location of physical barriers and pre-characterization Building cleaning containment areas relative to in-use and occupied tenant areas.

2. **Application, Sections 2.1.1 (Non-Porous Surfaces) and 2.1.2 (Porous Surfaces).** EPA interprets Sections 2.1.1 and 2.1.2 to be a pilot study. Within seven (7) days after the date of this Approval the Parties must confirm if Sections 2.1.1 and 2.1.2 are intended to be a pilot study. If this is the case, the PCB analytical results for materials sampled after cleaning with Simple Green must be compared to the PCB risk-based screening levels (PCB RSL) in Section 3.0 (Sampling and Analysis Plan) of the Application, or to risk-based levels developed through a site-specific risk assessment. The time frame to conduct and complete the pilot study must be proposed by the Parties for EPA approval. Such pilot study must not delay cleanup of the Building for continued use as the Parties must comply with the use authorization in 40 CFR 761.30(u)(1).

Clarifications. Sections 2.1.1 and 2.1.2 in the Application propose the use of Simple Green to remove grime, stains, and surficial contamination from porous (e.g., concrete, coated metal) and non-porous (e.g., bare metal) surfaces after removing dust via vacuums equipped with high-efficiency particulate air (HEPA) filters. EPA is not approving or disapproving the use of Simple Green for the purpose proposed in the Application. The proposal also includes collection of samples (e.g., wipes and core concrete samples) to determine the effectiveness of the pre-characterization cleaning (decontamination).

EPA is applying the current PCB RSL for soils of 1 mg/kg total PCBs (10^{-6} risk, industrial use) to the cleanup of porous surfaces inside the Building absent an RSL (expressed as weight/weight) specific to porous surfaces. If decontamination of porous and/or non-porous surfaces with Simple Green is not effective, more efficient cleanup procedures must be used. 40 CFR 761.79 establishes several decontamination methods (e.g., abrasives) the Parties may use for cleanup of PCBs inside the Building. Alternatively, the Parties may propose for EPA approval other methods supported by a pilot study that demonstrates their decontamination efficacy.

Post-characterization cleanup of PCBs inside the Building must involve decontamination methods that are effective in achieving the PCB cleanup levels for porous surfaces and any non-porous surfaces that may be impacted by PCBs.

3. **Application Section 2.2, Health and Safety Protection.** Protection of tenants must be based on implementation of the Application as modified by this Approval. In addition, risk-based screening levels for PCBs in air (vapor and particulates) and risk-based goals for cleanup of surfaces must be used as points of reference for tenant protection. The Health and Safety Plan proposed for remedial worker protection should not be used for tenant protection.

4. **Application, Section 3.0, Sampling and analysis plan (SAP).** Within seven (7) days after the date of this Approval, CBS must submit revised figures depicting the areas proposed for pre-characterization cleaning relative to the areas currently occupied and/or in use by the tenants.

   a. **PCB analysis.** Surrogate samples, matrix spikes, matrix spike duplicates and other relevant laboratory quality control samples should meet a minimum of 70% acceptance criteria.

   b. **Bulk samples.** Bulk samples must be collected in 250-mL wide-mouth glass containers with PTFE-lined lids. The samples must be maintained cool from collection in the field until arrival to the laboratory at a temperature equal to or below six (6) degrees. The Parties must adhere to the temperature requirements for sample preservation. The holding time for the samples before extraction is about 140 days. Each sample must be thoroughly homogenized before extraction. All samples must be subject to a post-extraction cleanup procedure to minimize interferences with the analysis and maintain analytical detection limits that allow comparison of analytical results to risk-based cleanup or decontamination levels.

c. **Samples of "sediment" accumulated in drains inside the Building.** Within seven (7) days after the date of this Approval submit figures depicting the location of the drains inside the Building that will be sampled. Prior to Building cleaning, discrete bulk "sediment" samples must be collected from each drain before removing the "sediments" for offsite disposal. These samples must be individually analyzed.

d. **Wipe samples, Clarification.** Surface wipes proposed to be collected from porous surfaces will be part of the information to determine if PCBs are present in dust accumulated on those surfaces. However, EPA will not consider those wipe samples to be representative of PCBs that have migrated beyond the surface of the porous material (e.g., concrete).

e. **Air sampling (Indoor and Background Outdoor).** Within seven (7) days after the date of this Approval, the Parties must propose additional air samples to be collected before and after they conduct pre-characterization cleaning. That proposal must include revised figures and tables depicting the actual location and number of the additional air samples relative to those already included in the Application as amended by CBS. A reference outdoor air background sample must be collected concurrently with all indoor air samples.

   Pre-cleaning and post-cleaning dust (bulk and wipes) and air samples must be collected in all areas currently being used as office space and special use rooms (e.g., break rooms). The revised figures must clearly show the layout of the Building and areas being used and/or occupied by the tenants.

   Within seven (7) days after the date of this Approval, the Parties must provide in writing to EPA a written description of the measures they will implement to prevent overloading of the PUF and quartz filter. The Parties must consult with their contract analytical laboratory on this matter since collection of 48-hour indoor air samples is proposed in the Application.

   Recommendations and clarifications. EPA recommends that high priority be given to indoor air sampling in (1) all rooms currently in use and/or occupied by the tenants, (2) any area of the Building where PCBs may be present in certain building materials (e.g., Galbestos, sealants, paint or other materials), and (3) areas with visual staining. The number of indoor air samples proposed in the Application may not be sufficient to characterize air quality inside the approximate 81,000 square foot warehouse area currently in use and/or occupied by tenants.

   All air samples must be collected for vapors and particulates. A quartz filter must be added to the PUF sampler (TO-10A sampling apparatus) to allow collection of particulates in the air. Vapor and particulate phases must be analyzed separately for each PUF / quartz combined air sampling train.

5. **Forced air heating, ventilation, and air conditioning (HVAC) system.** The Parties must clean all the HVAC systems in the Building including the HVAC system in the office area on the west side of the Building and the HVAC system in the interior office/break room area (below

mezzanines). The Parties must collect representative samples of the bulk dust removed from the HVAC systems to determine the disposal method. Surfaces wipes must be collected to ensure that no dust containing PCBs remains in the system.

Within 14 days after the date of this Approval the Parties must provide EPA with a description of the procedures to clean up or decontaminate the HVAC systems.

7. **Additional information.** Within 30 days after the date of this approval, CBS must submit the information requested in this condition to EPA.

   As required in 40 CFR 761.61(c), the Parties must submit a summary of all available site characterization data available for the PCB Cleanup Site. Readable electronic copies of laboratory analytical reports associated with PCB characterization and any PCB cleanup conducted at the Facility and the Building before the date of this Approval must be submitted in electronic format (e.g., CD-ROM). Figures of the Facility and Building depicting all sampling locations and sample analysis results to date must also be submitted.

8. **PCB waste transporters.** Consistent with 40 CFR 761.205, the transporter of the PCB waste must complete and submit the Notification of PCB Activity (EPA Form 7710-53 latest revision) to EPA HQs before transportation of the waste. Depending on waste storage needs, the Parties as the generators of waste containing PCBs (e.g., PCB remediation waste) may also need to fill and submit to EPA HQs the Notification of PCB Activity.

9. **Waste management and disposal.** Within seven (7) days after the date of this Approval, explain the measures the Parties will implement to prevent leakage of liquids contaminated with PCBs that may separate from the spent absorbent placed in plastic bags.

   Clarification. In Section 2.3 of the Application, waste containing PCBs is proposed to be placed into plastic bags and the plastic bags to be placed inside roll off bins for storage and subsequent transportation to the disposal site. The roll off bins must meet DOT specifications for containers used for storage of wastes containing PCBs and kept locked. Each bag containing PCBs must be labeled following the requirements in 40 CFR 761.45.

   PCB remediation waste and other PCB-containing wastes generated during performance of the Phase 1 Work must be disposed consistent with 40 CFR 761.61(a)(5), and applicable paragraphs in 40 CFR 761.60 and 761.79, respectively. PPE, rags, HEPA filters, and disposable sampling equipment must be disposed of in accordance with 40 CFR 761.61(a)(5)(v). Decontamination liquids must be sampled to determine actual PCB concentration for disposal and disposed based on that concentration. Copies of manifests and other pertinent disposal information shall be made available to USEPA upon request.

   Clarifications. Disposal of PCB remediation wastes must be based on the as-found PCB concentration in the waste and not on analysis of the waste after consolidated in bags. Alternatively, consistent with 40 CFR 761.61(a)(5)(i)(B)(2)(i), if the waste is not sampled and

analyzed to determine the PCB concentration for disposal, the waste must be assumed to contain PCBs at levels equal to or above 50 mg/kg.

The regulations establish an unrestricted use level for total PCBs in water of less than 0.5 ug/L. Water containing total PCBs above 0.5 ug/L must be disposed of via incineration (40 CFR 761.61(b)); or depending on the PCB concentration used or disposed of consistent with 40 CFR 761.79(b)(1) **and**, as applicable, also consistent with local discharge permit limitations.

10. **Decontamination. Movable equipment, sampling equipment, and tools.** The Parties must decontaminate movable equipment, sampling equipment, and tools consistent with 40 CFR 761.79(c)(2), (e), (f), and (g). The decontamination procedure in the Application is not consistent with 40 CFR 761.375. Before roll off bins are returned to the company furnishing such equipment, the bins must be decontaminated using applicable procedures and decontamination fluids specified in 40 CFR 761.79.