TO: F.E. DAILEY
T.K. IOANNOU

3/7/85

CC: T.G. HURLEY } COVER ONLY
U.A. SNIDER }

FROM: E.L. DOERFLEIN

I MET WITH LES SNIDER AND TOM HURLEY YESTERDAY AND WE REVIEWED THE ATTACHED SUMMARY OF PCB REGULATIONS WHICH APPLY TO THE SSP THERMINOL 60 SYSTEM. I HAVE GIVEN LES "PCB" SIGNS FOR TAGGING THE SYSTEM, STORAGE PAN, AND WASTE CONTAINERS. I'VE ALSO PROVIDED THE ATTACHED FORMS FOR KEEPING THE REQUIRED RECORDS ON THE STORAGE AREA.

LES AND TOM WILL TAKE THE LEAD ON REGULATORY COMPLIANCE. I WILL PROVIDE REGULATORY SUPPORT, PERIODICALLY REVIEW SSP'S COMPLIANCE STATUS, AND WORK WITH LES, TOM, AND JOHN BUZZARD IN ARRANGING A DISPOSAL CONTRACT.

SSP'S CURRENT PLANS ARE TO DRAIN THE SYSTEM OVER A 2 TO 3 DAY PERIOD AND REFILL IT WITHOUT A FLUSHING IN BETWEEN. WHETHER OR NOT THE SYSTEM IS FLUSHED, THERE IS A CHANCE THE <50 ppm PCB TARGET WILL NOT BE MET. ONE PROBLEM IN REMOVING PCBs FROM HEAT TRANSFER SYSTEMS IS THAT SLUDGES HIGH IN PCB CONTENT MAY HAVE ACCUMULATED IN LOW SPOTS, AROUND FILTERS, ETC. IF THESE SLUDGES ARE NOT REMOVED, PCBs MAY LEACH BACK OUT INTO THE CLEAN FLUID. IT'S HARD TO

PREDICT HOW MUCH BENEFIT FLUSHING WOULD BE, BUT IT IS WORTH CONSIDERING.

ALSO, IT WILL BE IMPORTANT TO COORDINATE THE DRAINING OPERATION WITH PICKUP BY THE DISPOSAL COMPANY SINCE WE DO NOT HAVE ADEQUATE FACILITIES TO STORE 30-40 DRUMS LEGALLY.

LET ME KNOW IF YOU HAVE ANY QUESTIONS.

Ed

ELD

PCB Issues @ SSP Therminol 60 System

The following regulatory requirements apply as long as tests show a heat transfer system contains ≥ 50 ppm PCBs.

40 CFR	Regulatory Requirement	Comments
761.30(d)(1)	Retest for PCBs at least annually an no sooner than 3 months after fluid refilling (see next item.)	Initial test results received 12/3/84 (> 50 ppm PCBs)
761.30(d)(2)	Drain and refill system w/ non-PCB fluid (≤ 50 ppm) within six months of test.	"
761.30(d)(3)	Cannot manufacture/process any FDC Section 201 food, drug, or cosmetic in equipment serviced by the heat transfer system.	See ELD memo of 1/28/85
761.30(d)(4)	Cannot add ANY fluid w/ > 50 ppm PCBs (even fluid previously removed) to the system.	SSP to control
761.30(d)(6 & 7)	Operators & maintenance personnel must wear Viton elastomer gloves when working on system where there is a potental for contact with PCB's.	SSP to control

MPM0000485

EPA004383

40CFR	Regulatory Requirement	Comments
761.3 "Disposal," "PCB Article," & "PCB Container"; 761.60(a); 761.60(b)(5)(B)(ii); 761.60(c)(1); 761.60(d)	ANY FLUID INTENTIONALLY OR ACCIDENTALLY (SPILLS, LEAKS, ETC.) REMOVED FROM THE SYSTEM, ANY RAGS/GLOVES/ABSORBENT/ OR SOLID DEBRIS CONTAMINATED WITH THE FLUID, AND ANY CAN/BOTTLE/DRUM/ ETC. WHOSE SURFACE HAS CONTACTED THE FLUID OR CONTAMINATED SOLIDS MUST BE DISPOSED OF AT AN OFF-SITE EPA-APPROVED FACILITY. DISPOSAL OF SYSTEM EQUIPMENT & PIPING ARE NOT REGULATED AS LONG AS ALL FREE LIQUIDS ARE DRAINED AND THE FLUID DISPOSED OF PER ABOVE.	NOTE, FOR EXAMPLE, ANY FLUIDS REACHING THE SEWER WOULD CONSTITUTE IMPROPER DISPOSAL. SSP MUST PROVIDE FACILITIES/PROCEDURES TO PREVENT SPILLS AND CONTAIN ANY FLUID WHICH IS DRAINED OR LEAKS FROM THE SYSTEM. SSP/EPC/PURCHASING WILL HAVE TO WORK TOGETHER ON DISPOSAL CONTRACT.

40 CFR	Regulatory Requirement	Comments
761.65(a&b)	Any materials which must be disposed of at an EPA-approved facility can be stored on-site for up to 9-months in accordance with 761.65.	EPC has provided SSP with a 5'x5'x 8" deep pan which can be used to store up to four 55-gal drums of material as long as it is kept in an area with "adequate roof and walls to prevent rain water from reaching the stored [material]". Because of storage area requirements, PCBs cannot be stored anywhere except this pan.
761.65(c)(5,8,9) 761.180(a)	The storage area must be inspected every 30 days for leaking containers. Leaking containers must be transfered to non-leaking containers and the leak cleaned up. The quantities and dates of materials as they are placed into or removed from the storage area must be maintained on a log.	SSP to inspect/keep log. EPC will provide inspection and storage area log forms. Inspection reports/logs to be sent to EPC for inclusion in annual PCB report for EPA.

MPM0000487

EPA004385

40 CFR	REGULATORY REQUIREMENT	COMMENTS
761.65(c)(6)	CONTAINERS USED FOR STORAGE ARE TO BE:	SSP TO CONTROL

DOT SPECIFICATION	SISTERSVILLE DRUM #
FOR LIQUIDS — SPEC 5 CONTAINER W/O REMOVABLE HEAD	—
— SPEC 5B " " " "	3429
— SPEC 6D OVERPACK W/ SPEC 2S OR 2SL POLYETHYLENE CONTAINERS	—
— SPEC 17E CONTAINER	3373 *
FOR NON-LIQUIDS — SPEC 5 CONTAINER	—
— SPEC 5B "	3429
— SPEC 17C "	—

761.65(c)(4) 761.79 ANY ITEM OF MOVABLE EQUIPMENT USED TO HANDLE PCB CONTAINERS IN A STORAGE AREA THAT COME IN DIRECT CONTACT WITH PCBs MUST BE DECONTAMINATED BEFORE BEING MOVED OUT OF STORAGE AREA. THIS MEANS SWABBING THOSE SURFACES THAT HAVE CONTACTED PCBs WITH A CLEAN SOLVENT WITH A PCB SOLUBILITY ≥ 5 WT.% AND DISPOSING OF THE USED SOLVENT AS A PCB MATERIAL.

40 CFR	REGULATORY REQUIREMENT	COMMENTS
761.180(a)	ALL RECORDS MUST BE MAINTAINED AT LEAST 5 YEARS.	EPC WILL KEEP FILE.
761.40(a)(1,8,10)	THE FOLLOWING ITEMS MUST BE TAGGED W/ "PCB" STICKERS: · THE PCB STORAGE PAN · ALL CONTAINERS WITH FLUID, CONTAMINATED SOLID MATERIAL, ETC IN THEM (WHETHER IN THE STORAGE AREA OR BEING USED AS DRIP PANS IN THE UNIT) · THE THERMINOL SYSTEM	EPC TO PROVIDE STICKERS.
761.40(b)	THE TAGS MUST BE PLACED IN A POSITION ON THE EXTERIOR OF THE ITEMS SO THAT THEY ARE EASILY READ BY ANYONE SERVICING OR INSPECTING THE ITEMS.	TAGS WILL HAVE TO BE REPLACED AS NECESSARY BY SSP.
761.65(c)(8)	PCB ITEMS MUST BE DATED WHEN THEY ARE PLACED INTO STORAGE.	SSP TO CONTROL