CHK 000056146
Part C 4G-1

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

OCT 0 6 2006

Linda Conlan, PG
Geomatrix Consultants, Inc.
510 Superior Avenue, Suite 200
Newport Beach, CA 92663

Re: Request for Approval of PCB Cleanup Notification Plan

Dear Ms. Conlan:

EPA has reviewed your application dated September 27, 2006 for self-implementing on-site cleanup and disposal of PCB remediation waste in accordance with the Toxic Substances Control Act (TSCA) regulations found at 40 CFR § 761.61(a). The application consists of the September 27, 2006 "Polychlorinated Biphenyls (PCB) Notification Plan, Pechiney Cast Plate, Inc. Facility, Vernon, California" prepared for Alcan, Inc. by Geomatrix Consultants, Inc. EPA is unable to approve your application.

The EPA review found that the application did not satisfy several of the requirements imposed under 40 CFR § 761.61(a). Should you wish to resubmit the application for EPA review, the following changes are recommended:

1) Application Structure: The application should be revised to include the information required in 40 CFR § 761.61(a)(3)(i)(A)-(E).

2) Nature of Contamination: The application assumes releases of PCBs occurred prior to 1979. The application also appears to indicate that the use of PCBs in galbestos and paint continues, and equipment that could have released PCBs may have been present after 1979. Additional evidence is required that PCB releases occurred before 1979. Otherwise, the releases should be assumed to have occurred during or after 1979 and the appropriate cleanup standards under 40 CFR § 761.61(a)(4) should be applied.

3) Sample Location: Site characterization and cleanup verification should be conducted in accordance with the grid sampling requirements of Subparts N and O of 40 CFR 761 as required by 40 CFR §§ 761.61(a)(2)&(6). Note that less dense sampling may be allowed if incorporated into a risk assessment and submitted as an application for risk-based cleanup approval under 40 CFR § 761.61(c).

4) Sample Type: The application indicates wipe samples were collected on concrete. Concrete is considered a porous surface under TSCA. Under Subparts N and O of 40 CFR 761, wipe samples are not considered an acceptable means to sample porous surfaces for the purposes of site characterization or cleanup verification.

5) Sample Result: Compositing of cleanup verification samples is allowed under 40 CFR § 761.289. Average sample results are not applicable to 40 CFR § 761.61(a).

6) Galbestos: The application correctly cites 40 CFR § 761.62(b)(i) as a means to dispose of galbestos. However, characterization sampling is still required to ensure that, if the galbestos deteriorated and contaminated adjacent areas, the contamination undergoes proper cleanup. Contamination that occurs as a result of deterioration of galbestos is subject to the PCB remediation waste requirements of 40 CFR § 761.61.

7) Recycled Metal: The application indicates metal components in contact with galbestos with a PCB concentration >500 ppm will not be decontaminated. That is counter to the requirement of 40 CFR § 761.62(a)(6). Such metal should be sent to a scrap metal recovery oven that meets the requirements of 40 CFR § 761.72(a) prior to smelting.

If you have any questions about this approval, please contact Max Weintraub of my staff at 415-947-4163.

Sincerely,

Paula Bisson

Paula Bisson
Manager
Toxics Office