

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 27 2016

REPLY TO THE ATTENTION OF:

Katie Platten
Environmental Consultant
Solomon Corporation
103 West Main Street
Solomon, Kansas 67480

Re: Notice of Deficiency on the PCB Commercial Storage Permit Application for the Prairie du Chien Facility

Dear Ms. Platten:


The U.S. Environmental Protection Agency has received your polychlorinated biphenyl (PCB) Commercial Storage Permit Application dated April 4, 2016.

EPA has reviewed your application to operate as a PCB Commercial Storer under 40 Code of Federal Regulations (C.F.R.) § 761.65 at your facility located at 1961 Vena Court, Prairie du Chien, Wisconsin. Under 40 C.F.R. § 761.65, the EPA may approve your application if the operations of the commercial storage facility will not pose an unreasonable risk of injury to health or the environment. The application submitted by Solomon Corporation does not provide sufficient information, or the information provided is in need of clarification, for EPA to make an unreasonable risk determination. In order for EPA to make a risk determination based upon the PCB storage proposed in the application, Solomon Corporation will need to address the comments provided in the attachment to this letter.

At this time, EPA requires the information to complete the review and process your application. This required information must be provided within 30 days from the date of receipt of this letter. If you are unable to provide the required information within the allotted time, you may request an extension, listing the reasons for your request and indicating when the requested information can be provided. Failure to provide the information by the required date or failure to request and obtain an extension may result in the EPA not approving your application for commercial storage of PCBs. Submittal of this information does not ensure approval nor does it preclude EPA from requiring additional information if needed.

The information should be submitted to Lisa Graczyk, of my staff, at the above address. If you have any questions regarding this letter or any of the information requested, please contact Lisa Graczyk at (312) 353-3219.

Sincerely,



Mary S. Setnicar

Chief

RCRA/TSCA Programs Section

Attachment: EPA Comments on the Solomon Corporation PCB Commercial Storage Permit Application for the Prairie du Chien Facility

cc: Lisa Graczyk, EPA, RCRA/TSCA Programs Section (LR-8J)
Robert Guenther, EPA, ORC (C-14J)

ATTACHMENT

EPA Comments on the Solomon Corporation PCB Commercial Storage Permit Application for the Prairie du Chien Facility

The following comments are based on review of the Solomon Corporation PCB commercial storage application dated April 4, 2016, for the facility located at 1961 Vena Court, Prairie du Chien, Wisconsin. The review was conducted to determine whether the Approval Application meets the requirements of 40 C.F.R. Part 761. These comments describe in detail what is missing or deficient in the Approval Application.

1. **General Comment.** Some of the text in the application is written in the future tense. For example on page 4 under 761.65(b)(1), the text states "The facility will consist of a 20,000 SF metal building...". Please revise the tense throughout the document to the present tense (i.e. "the facility consists of a 20,000 SF metal building...") as needed to reflect current conditions.
2. **General Comment.** There are no procedures for routine sampling. In the application, include procedures for routine wipe sampling of surfaces outside the curbed PCB storage area. At a minimum, these procedures should include frequency of sampling, how wipe samples are to be collected, number of samples to be collected, locations of samples, and analyses to be performed on the wipe samples.
3. **General Comment.** Please provide a copy of the facility health and safety plan with the application.
4. **Section 4.0, 40 CFR 761.65(d)(3)(iii).** In accordance with 40 C.F.R. §761.65(d)(3)(iii), the applicant for storage approval shall provide information concerning the technical qualifications of employees responsible for handling PCB waste. Provide this information under the heading for 40 CFR 761.65(d)(3)(iii).
5. **Section 4.0, 40 CFR 761(d)(3)(vi), Maximum Quantity of Waste at Facility.** This section states that the maximum capacity will not exceed 175 PCB Items. In this section, also insert the maximum quantity of PCB waste in gallons expected to be stored at one time.
6. **Appendix A, Closure Plan, 761.65(e)(1)(iii).** The maximum inventory of PCB wastes listed should match the maximum inventory listed in Section 4.0 of the application and as revised per EPA comment 5.
7. **Appendix A, Closure Plan, 761.65(e)(1)(iii).** In accordance with 40 C.F.R. §761.65(e)(1)(iii), there needs to be a "*detailed description of the methods or arrangements to be used during closure for removing, transporting, storing, or disposing of the facility's inventory of PCB waste, including an identification of any offsite facilities that will be used.*" On page 2 of the Closure Plan, it states that Clean Harbors of Coffeyville, Kansas, will transport and dispose of the remaining PCB inventory. However, there is no description of how the transformers will be disposed and at what

PCB concentrations. Revise this section or the information on page 2 to provide more detail on the disposal of the maximum PCB waste inventory.

8. **Appendix A, Closure Plan, 761.65(e)(1)(iv).** If heavy equipment is utilized for PCB activities, it should be decontaminated and wiped sampled. Discuss decontamination of heavy equipment in this section.
9. **Appendix A, Closure Plan, 761.65(e)(1)(iv).** For the Outdoor Area, it states that any areas showing PCB contamination will be excavated. Define what PCB concentration is meant by "PCB contamination".
10. **Appendix A, Closure Plan, Table 3.** The closure cost estimate presented in Table 3 must be certified by the person that prepared it (using the certification defined in 40 C.F.R. §761.3). See 40 C.F.R. §761.65(f)(1).
11. **Appendix A, Closure Plan, Table 3.** The following are comments on specific costs listed in the closure cost estimate in Table 3 or costs that are missing. Revise Table 3 based on the comments below.
 - a. Oil sample analysis costs by GC are listed at \$20/sample. PCB analysis costs by method 8082 are typically much higher than this (approximately \$50/sample).
 - b. Several of the "Transportation to Coffeyville, KS" costs are listed as a percentage "of load @ 582 miles/full load". It is assumed that the purpose of this is to combine several disposal items into one complete load. These percentages should add up to 100 percent; they currently only add up to 88 percent. It shouldn't be assumed that there will be 22 percent of a load from a facility other than Solomon Corporation combined with this load.
 - c. Include supervision costs in the cost estimate.
 - d. Include personal protective equipment costs for laborers in the cost estimate.
 - e. Include any heavy equipment rental costs for moving large items (drums, transformers, etc.), loading trucks, and excavating gravel.
 - f. Include disposal analytical costs for wastes generated during the closure (decontamination fluids, contaminated rags, etc.).
12. **Appendix A, Closure Plan, 40 CFR 761.65(f)(2).** Delete "labor and disposal" from the first sentence. All pricing in the closure cost estimate should be examined for inflation.