


US EPA ARCHIVE DOCUMENT

		Procedure Title: Operational Plan – Prairie du Chien		
Procedure Owner: Bob Baird	Document # ENV 001 WI	Revision Date: 07/07/2016	Effective Date: Pending State and Federal Approval	Approved By: Katie Platten

Policy: Refer to Solomon Corporation Environmental Policy

Purpose: This procedure defines the process for material handling of electrical equipment coming into or routed through the Prairie du Chien Facility. This material is defined by equipment type, PCB classification and intent of use (i.e. repair, recondition, recycle or disposal).

Scope: This procedure applies to the Prairie du Chien, WI facility only.

Facility Description:

The Prairie du Chien facility is a metal structure approximately 20,000 square feet built on a two acre parcel of commercially zoned land. It is located at 1961 Vena Court, Prairie du Chien, WI. The facility has a shop area that supports the repair and reconditioning of electrical equipment which includes testing, painting and welding processes. The facility will also recycle less than 50 ppm PCB transformers for scrap metal and include several offices. Plans for expansion include installation of four 7,500-gallon tanks for less than 50 ppm PCB oil storage.

The facility will maintain an SPCC plan, storm water permit and air permit. The facility is a conditionally exempt small quantity generator (CESQG) and is not required to be permitted under RCRA.

Plant hours of operation are typically Monday through Friday 6 am until 2:30 pm. Hours may be extended for overtime during periods of heavy business activity.

The following procedures are related to specific equipment types:

- Transformers / Regulators / Individual Bushings / PT's / CT's / OCB's.

Materials Accepted:

1.0 Non-Detect electrical equipment (<2 ppm PCBs) - Drained or Full

- 1.1 This equipment may be received on a regular bill of lading (no manifest is required).
- 1.2 This equipment may be repaired for the customer, placed into inventory for resale or recycled based on customer request or company directives.

2.0 Tested Non-PCB electrical equipment (2 – 49 ppm PCBs) - Drained or Full

- 2.1 This equipment must be received on a hazardous waste manifest per the State of Wisconsin.
- 2.2 This equipment may be repaired for the customer, placed into inventory based on Solomon Corporation's maximum PCB acceptance policy or recycled based on customer request or company directives.

3.0 Tested PCB-contaminated electrical equipment (50 – 499 ppm PCBs) - Drained

3.1 This equipment must be received on a hazardous waste manifest per the State of Wisconsin.

3.2 This equipment may be repaired for the customer under certain circumstances:

- Equipment in this category will require being processed through our triple-rinse decontamination process prior to being repaired. This is an expensive process and generally not financially feasible for equipment such as polemount transformers or small padmount units. In most cases it is financially beneficial for the customer to purchase reconditioned equipment directly from Solomon Corporation.
- Equipment that meets the criteria for repair (such as regulators and 3 phase padmount units) will be sent to Solomon Corporation's Commercial Storage facility in Solomon, KS for processing prior to the repair process.
 - Since this equipment is still in use, there is no 10-day transfer time that applies. However, equipment must be transferred back to Solomon, KS for processing in a timely manner so not to hold up the repair process.
- Once the transformers have been properly triple-rinsed, they will be returned to Prairie du Chien for repair.

3.3 PCB-contaminated electrical equipment not designated for repair cannot be placed into inventory for reuse. Equipment in this category shall be sent to Solomon Corporation's Commercial Storage facility for disposal.

4.0 Tested PCB-contaminated electrical equipment (50-499 ppm PCBs) - Full

4.1 This equipment may be received at the Prairie du Chien facility on a hazardous waste manifest.

- Use red "Caution" tape to segregate the equipment and to increase visibility. Full 50-499 ppm PCB units must be stored in the curbed containment area of the facility.

4.2 Equipment designated for repair in this category may be received at the Prairie du Chien Facility. It must be picked up on a hazardous waste manifest and by a haz-mat certified driver.

4.4 Equipment designated for repair will be triple-rinsed at the Solomon, KS facility and returned to the Prairie du Chien facility for repair.

- Refer to Solomon Corporation's procedures for repairing electrical equipment contaminated with PCB levels between 50 and 499 ppm for details of the triple-rinse process.

4.5 Equipment designated for disposal will be transported to the Solomon, KS facility for load consolidation or directly to an approved TSDF.

- Equipment in this category must be transported on a hazardous waste manifest, even if it is an inter-company transfer.

5.0 Tested PCB electrical equipment (Greater than or equal to 500 ppm PCBs) – Drained or Full

5.1 This equipment may be received at the Prairie du Chien facility on a hazardous waste manifest.

- Use red "Caution" tape to segregate the equipment and to increase visibility. Full 50-499 ppm PCB units must be stored in the curbed containment area of the facility.

5.2 Equipment in this category will be transported to the Solomon, KS facility for load consolidation or directly to an approved TSDF.

- Equipment in this category must be transported on a hazardous waste manifest, even if it is an inter-company transfer.

6.0 Untested Electrical Equipment (Unknown PCB Levels)

6.1 Repair Loads – Equipment shipped into the facility for repair but of an unknown PCB level

- No manifest is required.
- This equipment will be tested by a Wisconsin accredited laboratory to determine PCB level.
- Based on PCB results this equipment will be evaluated for repair for the customer.
 - Equipment less than 50 ppm may be repaired without special considerations.
 - Equipment that tests 50 ppm PCB and greater requires special consideration.
 - This equipment will be evaluated for repair at the Prairie du Chien facility. If it can be repaired, it will be sent to Solomon Corporation's Commercial Storage facility for processing. The unit will still be in use, so there will not be any waste generated until the oil is removed from the unit in Solomon, KS. At that point, the oil will be waste, and the date placed in storage for the oil will be the date of the analytical test result.
 - If the unit cannot be repaired, it will be sent to Solomon Corporation's Solomon, KS facility or another approved TSDF on a manifest for disposal. Solomon Corporation PDC will be listed as the generator. The date placed in storage for the oil will be the date of the analytical test result.

6.2 Recycle Loads – Equipment of unknown PCB levels designated as recycle or reuse may be sent to Prairie du Chien, WI. This equipment must be shipped to Prairie du Chien on a hazardous waste manifest.

- This equipment has been designated as waste until GC testing proves the oil contained in the electrical equipment contains less than 50 ppm PCBs. As a service to our customers, Solomon Corporation will accept this equipment and evaluate it to determine if the equipment may be put back into service or disposed of based on specific regulatory requirements and electrical testing parameters. These evaluations must be performed at a Commercial Storage facility.
 - Units that are less than 50 ppm PCB and electrically and structurally sound may be kept for remanufacturing inventory based on Solomon Corporation's maximum PCB acceptance policy, unless the customer profile specifically indicates the transformer is designated for disposal by recycling only.
 - Units that are less than 50 ppm PCB but greater than Solomon Corporation's maximum PCB acceptance policy, or units that are not electrically and structurally sound may be salvaged for component materials.
 - Units that are greater than 50 ppm PCB will be processed according to 40 CFR 761 requirements at our Commercial Storage facility in Solomon, KS.

6.4 Driver and Facility Personnel Directives:

- Untested equipment sent to the Prairie du Chien facility for repair should be placed on a load sheet designated for **Repair**.
 - This equipment may be staged at the facility while samples are collected and sent to Solomon, KS for PCB testing.
 - Once PCB results confirm the units are less than 50 ppm, the units may be evaluated for repair.
 - Units that test 50 ppm or greater will need to be sent to Solomon Corporation's Commercial Storage facility. Refer to the appropriate section above for handling instructions.
- Untested equipment designated for recycle should be listed on the load sheet as **Recycle**. Recycle and Repair units must be written up on separate load sheets.
 - The Prairie du Chien facility shall maintain a separate area inside the facility for units to be stored if they are determined to be greater than 50 ppm PCBs.

- Units must be clearly labeled using the colored label system established by Solomon Corporation. Units must be stored in the PCB storage area.
- This area must be inspected as detailed in the Commercial Storage permit. Inspections must be documented and kept on file at the Prairie du Chien office.
- Any leaks must be cleaned up immediately. Clean up debris, such as floor dry, absorbent pads, etc must be placed in a sealed 55 gallon steel drum.
 - The steel drum must be labeled with an M_L PCB sticker, a number 9 sticker, and a completed white Solomon Corporation label that includes the date placed in storage, a unique ID number and the words "Assume greater than 500 ppm PCBs".

7.0 Other Material

7.1 The following list highlights common material that is inherently waste-like and will have to be manifested to Prairie du Chien on a hazardous waste manifest.

- Clean-up Debris
- Soil in Drums
- Drummed Oil (Unknown PCB content or Known or Assumed greater than 50 ppm PCBs)
- PCB Capacitors
 - Use red "Caution" tape to segregate the equipment and to increase visibility. Drums of waste must be stored in the curbed containment area of the facility.

7.2 The following material cannot be received by either Prairie du Chien or Solomon Corporation's Commercial Storage facility. It will need to be sent directly to an off-site waste handler. Please contact the Corporate Environmental Department for assistance with these items.

- RCRA Waste
- Drums of Unknown Liquids or Solvents
- Asbestos Bearing Equipment
- Batteries
- Automotive Waste
- Freon Filled Equipment
- Wecosol Filled Equipment

Revision History:

Revision	Date	Description of changes	Requested By
0.01	12/1/15	Initial Release	Mike Dahl
0.02	12/15/15	Draft Revision 1	Bob Baird
0.03	12/31/15	Section 3.3 Removed 10-day transfer requirement for drained 50-499 equipment since it is not regulated	Twila Jeffrey
0.04	7/7/16	Revised document for Commercial Storage permit.	Bob Baird