

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 27 2016

Todd Hendrick, Compliance Officer
Environmental Recycling Group
527 East Woodland Circle
Bowling Green, Ohio 43402

REPLY TO THE ATTENTION OF:

Re: Review of Environmental Recycling Group's Updated Commercial PCB Storage Application

Dear Mr. Hendrick:

On March 22, 2010, the U.S. Environmental Protection Agency received an updated commercial polychlorinated biphenyl (PCB) storage application from Environmental Recycling Group (ERG) for the facility located at 527 East Woodland Circle, Bowling Green, Ohio, and a notice of intent to continue the EPA approval to store PCBs. On May 12, 2010, EPA sent a letter to ERG confirming receipt of this notice and that the approval and its conditions remain in effect beyond the approval expiration date until EPA completes its review of the submitted information and makes a final determination regarding whether the approval is to be renewed.

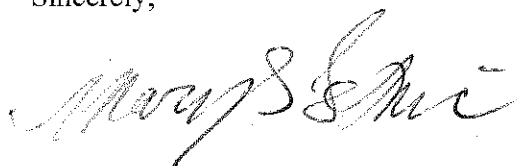
The EPA has reviewed ERG's application with updated information to operate as a PCB commercial storer under 40 Code of Federal Regulations (C.F.R.) § 761.65 at the facility located at 527 East Woodland Circle, Bowling Green, Ohio. Comments on the updated application are provided in the attachment to this letter.

At this time, EPA requires the comments in the attachment to be addressed by ERG. This required information must be provided within 60 days from the date of receipt of this letter. If ERG is unable to provide the required information within the allotted time, ERG may request an extension, listing the reasons for the 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 the updated 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.

ERG's PCB commercial storage approval and its conditions continue to remain in effect while EPA completes its review of the submitted information and until EPA makes a final determination regarding whether the approval is to be renewed.

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 Environmental Recycling Group's Updated Commercial PCB Storage Facility Application dated 2010

cc: Lisa Graczyk, EPA RCRA/TSCA Programs Section
Thomas Kenney, EPA ORC

ATTACHMENT

EPA Comments on Environmental Recycling Group's Updated Commercial PCB Storage Facility Application dated 2010

The following comments are based on a review of Environmental Recycling Group's (ERG) Updated Commercial PCB Storage Facility Application, dated 2010, for the ERG facility located in Bowling Green, Ohio. The review was conducted to determine whether the Updated Application meets the requirements of 40 CFR § 761.65, 761.79, and 761.180. These comments describe in detail what is missing or deficient in the Updated Application.

1. **Section A-3.** The last sentence of this section indicates that there are no agricultural lands within a 1.0-mile radius of the ERG facility. From aerial imagery (Google Earth) it appears that there are some agricultural plots within 1 mile of the facility. Revise the last sentence of this section as applicable.
2. **Section C-4.** The first paragraph of this section states that "Any sorbents or residues from the spill cleanup is properly disposed of as PCBs per 40 CFR 761.60(a)(4)." There is no 40 CFR 761.60(a)(4) regulation in the TSCA PCB regulations. Revise this text to the correct citation.
3. **Chapter 5/Appendix I.** In accordance with 40 CFR 761.65(d)(3)(v), ERG is required to provide a "list of all companies currently owned or operated in the past by the principals or key employees identified in paragraphs (d)(3)(i) and (d)(3)(ii) of this section that are or were directly or indirectly involved with waste handling activities." Provide this information.
4. **Sections E-2 and E-3.** These sections should contain more detail. ERG should examine annual reports from previous years to determine the mix of PCB wastes (percentages of total) that ERG has been receiving (i.e. transformers, florescent light ballasts, drums of PCB mineral oil, PCB debris, etc.). ERG should then detail in Section E how each type of PCB waste will be disposed (i.e., chemical waste landfill, municipal solid waste landfill, incineration, etc.) and where each waste will be disposed. This is in accordance with 40 CFR § 761.65(e)(1)(iii) which states closure plan must have "an estimate of the maximum inventory of PCB wastes that could be handled at one time at the facility over its active life, and 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.**"
5. **Sections E-3 and F-12.** ERG stated in these sections that closure is estimated to occur in 2020. If this estimate has changed, revise this date in these sections.
6. **Section F-1b.** The "Procedures" described in Section F-1b can be misinterpreted to mean that only two random samples will be collected from the floor and two from the wall to determine if the PCB storage and receiving areas are contaminated. In Section F-1b,

revise the text to clarify the sampling will be conducted as described in Sections F-6 and F-7.

7. **Section F-7b(i).** This section states that the floor will be viewed as being 30 feet wide and 45 feet long; however, the selection of random numbers are for 0 to 34.5 feet and 0 to 37 feet. Also, Section F-1a says that the PCB Storage Area is 40'5" by 27'8". In section F-7(b)(i), revise the length and width to the correct values for the selection of sampling points and if needed revise the dimensions stated in Section F-1a.
8. **Section F-8b(xx).** The current PCB SW-846 analytical method is 8082A and not 8080.
9. **Closure Cost Estimate.**
 - The decontamination cost is too low. This cost should include labor plus equipment and supplies (high pressure sprayer rental, PPE, drums, decontamination solvent, etc.). The costs should be based on a third-party performing the closure activities.
 - Supervision costs are missing.
 - The costs for disposal of maximum PCB inventory should reflect a mix of PCB wastes that is consistent with what ERG is actually storing at their facility (see comment 4). For example, in 2014 PCB mineral oil (in containers) was approximately 22 percent (by weight) of the total PCB items at ERG's facility. Revise disposal costs to reflect the actual mix of PCB wastes that ERG is storing at their facility and where the wastes are being disposed.