ERG
ENVIRONMENTAL
SERVICES

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Jae

8/25/16

Bob Kaplan
U.S. EPA-Region 5 Pollution Prevention and Program Initiatives
EPA Region 5 (LR-8J)
77 W. Jackson Blvd.
Chicago, Illinois 60604

RE: TSCA Permit Renewal: Response to comments dated June 27th 2017.

Dear Mr. Kaplan

We have received your response and comments to our Commercial Storage application submitted in March 2010.

Please see the attached edited storage application with updated information. The response will be in the same order as the comments received. The original content will remain in the text all new changes will be identified with a double line strikethrough identifying the change. Any new content will be identified in bold text.

In addition to these edits some updates were necessary as one of the key personal listed in the permit is no longer with ER. Matt Zachary's name has been removed from the permit application with a double line strikethrough. At this time there is not a replacement. Paul Cottrell will be assuming his responsibilities as PCB Manager. Some minor details have also been edited to represent the current operations at ER. These edits are itemized in this response directly after the after the originally requested responses.

I have also included the replacement pages for any edits that were made, each page has the double strikethrough and new content if any.

If you have any questions or require any further information please do not hesitate to contact me.

Sincerely,

Todd Hendrick

Compliance Officer

1.

A-3 ENVIRONMENTAL CONDITIONS OF THE SITE

ER's Commercial PCB Storage Facility is located within the ER complex. All incoming and outgoing PCB's will be loaded and unloaded within the confines of the specially designed, contained *PCB Receiving and Storage Area* (see Figure A-4, Appendix A.I). The *PCB Storage Area* is designed with spill-control features and equipment to contain and remove any spills or leaks and has a total containment capacity of 6270 gallons.

ER is located within the Woodbridge Industrial Park, Bowling Green, OH. There are no drains within the ER Commercial PCB Storage Facility leading to the storm-water or sewerage systems. Storm-water catch basins are located on the east side of the facility

PCB wastes will be handled and stored within the totally covered and contained ER Commercial PCB Storage Facility. The design of ER Commercial PCB Storage Facility, the handling and storage practices, and the employee training programs ensure that a release of PCB's into the environment is unlikely.

~~There are no agricultural lands, animal grazing lands, or large commercial vegetable gardens within a 1.0-mile radius of the ER facility.~~

2.

C-4 INSPECTIONS

Any sorbents or residues from the spill cleanup is properly disposed of as PCB's per 40 CFR 761.60~~(a)(4).~~ Leaking containers are properly overpacked in properly marked non-leaking containers.

3.

3f In accordance with 40CFR 761.65(d)(3)(v), provided is a list of all companies currently owned or operated in the past by the principals or key employees identified in paragraph 3c.

SQS, Inc. dba ERG Environmental Services
13040 Merriman
Livonia, MI 48150

SQS, Inc. dba ERG Environmental Services does not manage PCB wastes. The facility does not have any permits or required closure plans.

4. E-2 and E-3

E-2 MAXIMUM INVENTORY

- Below is a percentage break down of maximum inventory content that ER may have at any given time and the disposal method for item. The percentages were gathered using historical data from the annual reporting requirements.

LARGE CAPACATIORS	50-500 ELECTRICAL EQUIPMENT	>500 TRANSFORMERS	PCB OIL DRUMS	PCB DEBRIS IN DRUMS	PCB CONTAMINATED WATER
5%	35%	5%	20%	32.5%	2.5%
INCINERATION	CHEMICAL WASTE LANDFILL & INCINERATION	CARCASS TO CHEMICAL WASTE LANDFILL OIL TO INCINERATION	INCINCERATION & DE-CHLOR	CHEMICAL WASTE LANDFILL	PHASE SEPERATION - CARBON TO CHEMIAL WASTE LANDFILL

A list of approved disposal vendors is listed below in section E-3

E-3 Disposal of Inventory

Disposal of all PCB items will follow the guidelines set forth in 40 CFR 761.60. The maximum volume of waste as described in Section E-3 will be disposed. Methods of disposal and processing procedures required for closure are discussed below. The designated PCB waste disposal facility for solids is US Ecology, Wayne Disposal facility located in Bellville MI. Liquids will be disposed of at Clean Harbors located in Twinsburg Ohio. The secondary facility is Veolia Environmental Services, Inc. located in Port Arthur, Texas. All PCB material will be sent to an approved TSCA facility for final disposal. Any miscellaneous equipment (e.g. pumps, hoses etc.) contaminated with PCB will be disposed at closure. Transportation shall be provided by 3rd party or disposal facility identified above.

US Ecology **Clean up contractor**
26705 Northline Road
Taylor, MI 48180
This was added to our list of approved vendors in both sections E-3 and F-10.

5.

E-3 DISPOSAL OF INVENTORY

ER does not have a definite final closure date; however, the date of closure is estimated to be the year ~~2020~~ **2045.**

F-12 SCHEDULE FOR CLOSURE

ER does not have a definite final closure date, but the date of final closure of the ER Commercial PCB Storage Facility is estimated to be the year ~~2020~~ **2045**.

6.

F-1b

F-1b PCB Receiving

The PCB Receiving Area is enclosed on the west side by a sealed continuous mitered floor/concrete-wall joint. All sealed curb/floor and sealed mitered wall/floor joints are smooth and continuous, and the area is regularly inspected to ensure that there has not been a breakdown in the integrity of the containment areas.

Procedures

Statistical sampling, decontamination activities (if required), and verification sampling procedures will be performed in these areas. All those areas below 6 feet within the ER Commercial PCB Storage Facility will be treated as high-contact industrial surfaces requiring a cleanup standard of 10 ug/100 cm^2 (as measured by standard wipe tests).

A pre-cleanup survey and screening sampling plan will be used to determine those areas within ER Commercial PCB Storage Facility which require decontamination (if any). Random sample locations will be chosen so that all of the containment surfaces have an equal chance of being selected. To choose the sampling locations, the height (to 6 feet) and total perimeter of the walls within ER Commercial PCB Storage Facility will be measured in feet. ~~Two random numbers, which are between zero and the total perimeter and between zero and the height and which represent the distance along the length and height of the walls to 6 feet, will be generated~~. ~~A sample will be collected at this location.~~ To choose the floor sampling locations, the width and length of the ER Commercial PCB Storage Facility floor area will be measured in feet. ~~Two random numbers, which are between zero and the length and between zero and the width and which represent the distance along the length and width of the floor area, will be measured.~~ ~~A wipe sample will be collected at this location.~~ **Sampling will be conducted as described in Sections F-6 and F-7.** If wipe samples indicate area(s) with PCB concentrations above the regulated levels, statistical sampling grids based on a sampling scheme adapted from the Midwest Research Institutes "Verification of PCB Spill Cleanup by Sampling and Analysis" and "Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup" documents will be developed for these areas. Those wipe-sample areas indicating PCB

concentrations above the 10 µg/100 cm^2 standard will be decontaminated with appropriate PCB soluble cleaners and re-sampled to verify compliance with the cleanup standard.

7.

F-7b(i) PCB Storage Area

In addition to the nine discretionary samples taken within the PCB Storage Area, thirty-six random samples will also be taken from the floors. In the PCB Storage Area, the entire floor will make up a single sampling grid. The north/east wall of this area will be included with the sampling of the PCB Storage Area.

The floor of the PCB Storage Area will be viewed as being one contiguous area. The floor area will be viewed as being ~~30 feet wide and 45 feet long~~ **40.5 ft long x 27.8 ft**. The selection of the nine (9) sampling points for the floor surfaces will be determined at the site through the generation of two random values: one between zero and ~~34.5~~ **40.5** feet, and one between zero and ~~37~~ **27.8** feet. The intersection of these two values represents the sampling point within the grid. A single wipe sample will be collected at each sampling point. The technician will enter the sample collection data in the field logbook, on the sample bottle, and on the chain-of-custody form. All samples will be held in a 4°C ice chest.

8.

F-8b(xx) Laboratory Analyses

The laboratory will conduct all analyses in accordance with U.S. EPA's SW-846 "Test Methods for Evaluating Solid Waste" 3rd Ed. Nov. 1986. These procedures incorporate stringent quality-control requirements and describe precision, accuracy, calibration criteria, internal standards, and method-detection limits.The following methods as listed in SW-846 will be used to test for PCB's:

Scrape/Destructive

Parameter	SW-846 Method
PCB's	~~8080~~
Aroclors 1016,1221	**8082A**
1232, 1242, 1248	
1254 and 1260	

Wipe Samples

Parameter	SW-846 Method
PCB's	~~8080~~
Aroclors 1016,1221	**8082A**
1232, 1242, 1248	
1254 and 1260	

9.

FINAL CLOSURE COST ESTIMATE FOR THE ER COMMERCIAL RECYCLING FACILITY

Storage Area

1. 50 Drums of Fluorescent Light Ballasts

50 drums at $65.00 each $3250

2. PCB article containers

10 drums approximately 250 pounds each

10 drums X 250/lbs X $0.90 $2250

3. 1 Drum decon water $250

4. PCB-contaminated electrical equipment

5 units

5 units X $25/unit $125

2. PCB transformers

(1) 125 cubic foot unit

(1) 125 ft3 X $5.50/ft3 $688

3. PCB Storage Area Equipment

(1) cubic yard box $125

Subtotal Storage Areas Disposal Costs $6688

Transportation Costs (10% of Subtotal) $669

TOTAL STORAGE AREAS DISPOSAL COSTS $7357

FINAL CLOSURE COST ESTIMATE FOR THE ER COMMERCIAL RECYCLING FACILITY

Storage Area

Disposal inventory and costs

PCB STORAGE AREA CONTENTS	MAX INVENTORY	TOTAL COST OF DISPOSAL
CAPS	1 DRUM (250 LBS)	$400.00
ELECTRICAL EQUIPMENT (LANDFILL) BALLASTS, SMALL CAPS. MISC ITEMS	17 DRUMS	$1,400.00
ELECTRICAL EQUIPMENT (INCINERATION) BALLASTS, SMALL CAPS, MISC. ITEMS	4 DRUMS	$1750.00
>500 TRANS	5 UNITS	$3,800.00
50-499 PCB OIL DRUMS (DE-CHLOR)	13 DRUMS	$4,900.00
PCB OIL DRUMS (INCINERATION)	6 DRUMS	$3,250.00
PCB DEBRIS DRUMS	25 DRUMS (6250 LBS)	$400.00
PCB WATER DRUMS	6 DRUMS (330 GAL)	$2,100.00
INVENTORY REMOVAL FROM STORAGE	2 TECHS - 2 HOURS	$150.00
DISPOSAL TOTAL		**$18150.00**
TRANSPORTATION FEES	10%	$1,815.00
TOTAL INCLUDING LABOR, DISPOSAL AND TRANSPORTATION		**$19,965.00**

Calculations are based on maximum daily inventory that ER may have at any given time. This data in direct correlation with section E-2 (Maximum Inventory) of this storage permit application.

All disposal cost estimates are reflective of the current dollar value for labor, equipment Rental, use, replacement, and transportation/disposal.

Cleaning, Disposal, Sampling Costs

1. Decontamination, of the interior ~~45' X 30'~~ area and access approach aprons.

   (Assumes that the both the interior and access approach aprons need decontamination.)

~~Estimate 1 days @ $200/day $200~~

Estimate 1 day

2-Man crew 8 hours (16 Hours total)	**@ $40.00/hour**	**$640.00**
1-Supervisor 8 hours	**@ $55.00/hour**	**$440.00**
1-Safety Coordinator 8 hours	**@ $65.00/hour**	**$520.00**
3000 PSI Pressure Washer	**@ $250.00/day**	**$250.00**
Decon Fluid 10 gallons	**@ $5.00/Gal**	**$50.00**
4-PPE (Level D)	**@$20.00/person**	**$80.00**
Miscellaneous expendable supplies	**1 Lot**	**$250.00**

Total - (Decon of storage area and approach) **$2,230.00**

***Disposal of cleaning wash waters in disposal cost already calculated above (PCB water)**
***Disposal of cleaning solid materials in disposal cost already calculated above (Solids)**

2. Pre-cleanup screening samples and analysis

   Estimate 2-man crew 4 hours
   @ $40.00/hr/man $160 $320

   85 sample bottles and analysis (pre cleanup)
   @ average cost of $45.00/per analysis $3825

3. Post cleanup wipe/scrape samples and analysis

   Estimate 2-man crew 4 hours
   @ $40.00/hr/man $160 $320

   85 sample bottles and analysis (post cleanup)
   @ average cost of $45.00/per analysis $3825

4. One drum disposable cleanup items
   (solids) @ $65/drum $65

Total for pre and post sampling **$8,355.00**

(Contents of these drums include such items as personal protective equipment, templates, brooms, squeegees, absorbents pads, gloves, overboots, etc., which were used during the screening sampling phase of closure and, assuming the worst, those items used during the decontamination and verification sampling of the PCB storage areas.)

5. If need estimated (1) 20 cubic yard box (solids) concrete/soil	$2300
TOTAL ESTIMATE CLEANUP	**$12,885**

SUBTOTAL OF CLOSURE COSTS	$32,850
Documentation and Certification 10% of Subtotal	$3,285.00
Contingency 10% of Subtotal	$3,285.00
TOTAL ESTIMATE FOR CLOSURE OF ER's COMMERCIAL PCB STORAGE FACILITY	**$39,420**

Additional updates since the 2010 submittal renewal

A-1 GENERAL DESCRIPTION

ER's licensed ~~Straight Truck~~ **vehicles** carry special safety equipment and sorbent materials for oil and hazardous material spill cleanup (including PCB's).

A-2h Other Key Topographic Features and Other Structures

The land occupied to the east of ER is owned by ~~AG-Chem a farm equipment supplier~~. ~~**Wood County Bandag**~~**, a vehicle tire distributor**.

B-2 COMMERCIAL PCB STORAGE FACILITY

An eyewash fountain is centrally located by the PCB storage area. A first-aid kit is located on the east wall near the ~~work desk~~ **shipping office,** Lockers containing safety equipment and disposal clothing are located on the ~~east~~ **west** wall. The equipment includes air-purifying respirators, chemical-resistant coveralls, hard hats, chemical-resistant over boots and gloves, safety glasses, goggles, and full-face shields.

B-4 EQUIPMENT

The ER Commercial PCB Storage ~~Facility~~ **area** contains a ~~work desk, first-aid cabinet~~, ~~scale,~~ spill kits, ~~fire extinguishers~~, floor maintenance equipment, brooms, shovels, and an eyewash station.

All the equipment located in the ER Commercial PCB Storage ~~Facility~~ **area** will be disposed of in a licensed PCB landfill or other authorized PCB disposal facility at closure. Therefore, there will not be any equipment left in the ER Commercial PCB Storage ~~Facility~~ **area** requiring wipe sample screening or decontamination. ~~The equipment is one (1) drum cart, one (1) drum lifter, one (1) pallet, one (1) portable scale lifting slings two (2) to lift PCB transformer or electrical equipment and place on pallets for storage.~~

C-2 SAFETY EQUIPMENT

An industrial first-aid kit is located on the east wall near the ~~service desk~~ **shipping office**. ~~A locker containing safety equipment and disposable protective clothing is also located in the area~~.

F-5b Emergency Information

~~**Matt Zachary**~~
~~Assistant Health and Safety Officer~~
~~419-354-6110~~

CHAPTER 5
DISCLOSURE STATEMENT

~~**Matt Zachary**~~
~~**Facility/PCB Manager**~~
~~**Transportation/Personal**~~

A-1 GENERAL DESCRIPTION

ER is licensed by the OEPA as a recycling facility with EPA I.D. OHR000034025.

ER operations are focused on providing their customers with services pertaining to the recycling of fluorescent lights, electronics, mercury devices, batteries and other universal wastes to assure compliance with all applicable local, state, and federal regulations. These services include actual removal including transportation. The range of operations is mainly EPA Region V.

ER specializes in transportation and recycling of fluorescent and other mercury containing lights for recycling. ER also assists it clients in complete electrical light change-outs. With the closure of S.D. Myers a Commercial PCB Facility the clients we service along with other small generators are in need of a cost-effective replacement. For this reason, we wish to accept PCB fluorescent light ballasts, electrical equipment, capacitors along with other PCB items and operate a Commercial PCB Storage Facility. (This facility would only accept PCB Material including oil in drums or contained in electrical equipment but not exceed 4900 gallons at one time in our storage area. The material will be in storage no longer than 30 days after securing shipment to a licensed PCB incinerator, landfill, recycle.)

ER's licensed ~~Straight Truck~~ vehicles carry special safety equipment and sorbent materials for oil and hazardous material spill cleanup (including PCB's).

The street and mailing address is:

Environmental Recycling
527 East Woodland Circle
Bowling Green, OH 43402

Figure A-1 (Appendix A.I) is a location map, and Figure A-2 (Appendix A.I) is a regional topographic map of the area with a scale of 1:24,000 and 5-foot contour intervals. Figure A-3 (Appendix A.I) is a site plan of the facility complex showing the boundaries and major buildings, containing ER offices, operational areas, and the Commercial PCB Storage Facility. Design specifications, for the ER's Commercial PCB Storage Facility, are provided in Section B.

The leased ER complex of approximately 24000 square feet, owned by Pemm Group, which are the same personal that own and operate Environmental Recycling (ER), is located within the City of Bowling Green, OH. ER is located near the northeast corner of the intersection of Dunbridge Road and south of Poe road, northwest quarter of section 21, Township 4 north, range 11 east, Center Township Wood County, Ohio. Latitudinal and longitudinal coordinates for ER are 83 degrees 36 minutes 11 seconds and 41 degrees 22 minutes 48 seconds respectively. ER began in 1995.

A-2d Other Buildings

No other buildings are located on ER property.

A-2e 100-Year Floodplain

The ER facility is not located within the boundaries of a 100-year flood plain. The ER area is rated as industrial/commercial.

A-2f Adjacent Surface Waters

There are no surface waters or wetlands in the immediate vicinity of the ER complex. The nearest creek is located over one mile from ER.

A-2g Surrounding Land Uses

The surrounding land uses are industrial/commercial.

A-2h Other Key Topographic Features and Other Structures

The land occupied to the east of ER is owned by ~~AG-Chem a farm equipment supplier~~. ~~**Wood County Bandag**~~**, a vehicle tire distributor**. The property to the immediate south is a ~~vacant and ready for development~~ **rented storage warehouse for a local business.** The property to the west is ~~vacant ready for development~~. **Absorbents Products Company Inc**. The property to the immediate north is occupied by Sandusky Electric an electrical supply house.

A-2i Underground Storage Tanks

NONE

A-2j Wind Rose

The prevailing winds are southwest.

A-2k Traffic Patterns, Access and Internal Roads

Access to ER is from the I-75 interstate exit ~~161~~ **181** (Bowling Green exit). Dunbridge Road is to the East of the interstate. Heading ~~south~~ **North** on Dunbridge Road to Woodbridge industrial park entrance (east). Leading to East Woodland Circle. This area is zoned industrial/commercial.

A-2l Security Systems

The building is monitored 24/hour by an independent security/fire company. The company is ~~Tecom Guard Alarm & Signal, Inc~~ Habitec Security

A-2m Closed PCB Waste Management Units

No areas are ~~open or~~ closed for PCB waste management at this time.

A-2n Fire Control Facilities

Heat sensors are located throughout the warehouse/receiving area. Smoke detectors are located in the separate office areas. All fire systems are monitored 24/hours. Fire extinguishers are located throughout the entire structure.

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A-3 ENVIRONMENTAL CONDITIONS OF THE SITE

ER's Commercial PCB Storage Facility is located within the ER complex. All incoming and outgoing PCB's will be loaded and unloaded within the confines of the specially designed, contained *PCB Receiving and Storage Area* (see Figure A-4, Appendix A.I). The *PCB Storage Area* is designed with spill-control features and equipment to contain and remove any spills or leaks and has a total containment capacity of 6270 gallons.

ER is located within the Woodbridge Industrial Park, Bowling Green, OH. There are no drains within the ER Commercial PCB Storage Facility leading to the storm-water or sewerage systems. Storm-water catchbasins are located on the east side of the facility

PCB wastes will be handled and stored within the totally covered and contained ER Commercial PCB Storage Facility. The design of ER Commercial PCB Storage Facility, the handling and storage practices, and the employee training programs ensure that a release of PCB's into the environment is unlikely.

~~There are no agricultural lands, animal grazing lands, or large commercial vegetable gardens within a 1.0-mile radius of the ER facility.~~

A-4 REJECTED LOADS

Rejected loads will be handled in accordance with the procedures outlined in Appendix A.II

containment volume for this area is 40' 5" X 27' 8" X 9" approximately 6270-gallons. The total internal volume of all containers to be stored in this area is 4900 gallons, providing a containment ratio greater than 2.0 (containment ratio = volume of containment/total internal volume of containers stored in contained area). The containment volume of this area is more than two times the volume of the largest PCB Article or PCB Container stored in this area or greater than 25 percent of the total internal volume of all PCB Articles or PCB Containers stored in this area. ~~The steel ramp provides access for handcarts and, if required, a forklift truck.~~ (SINCE ER WILL ONLY EXCEPT LESS THAN 4900 GALLONS AT ONE TIME THERE WOULD NEVER BE A LIQUID LEAK THAT WOULD EXCEED OR MEET OUR CONTAINMENT AREA)

All sealed steel dike/floor and sealed mitered dike/floor joints are smooth and continuous, and the area is regularly inspected to ensure that there has not been a breakdown in the integrity of the containment areas.

B-2b PCB Receiving Area

The PCB Receiving Area is enclosed on the east side by a sealed, continuous, mitered floor/cinder-wall joint. The floors are coated and sealed with a non-porous epoxy polyurethane sealer.

All sealed floor and sealed mitered wall/floor joints are smooth and continuous, and the area is regularly inspected to ensure that there has not been a breakdown in the integrity of the containment areas.

B-2c Housekeeping & Operating Practices

The entire Commercial PCB Storage area is well lighted and is kept in a very clean condition at all times. Aisle and passageways for transfer of equipment are clearly marked with painted yellow lines. The containers, brought to this facility by properly licensed vehicles, are labeled and manifested prior to pickup by ER and need only to be recorded and weighed upon arrival at the site.

The interior ER Commercial PCB Storage Facility area will be sampled annually to determine the effectiveness of work practices, inspections, and standard operating procedures. (AGAIN ER FEELS THAT CONTAMINATION IS AT THE LOWEST RISK DUE TO THE FACT THAT ER WILL ONLY RECEIVE INTACT NON-LEAKING CONTAINERS HOLDING THE PCB MATERIALS.)

B-3 SURROUNDING SOIL, PAVEMENT AND VEGETATION

The land surface immediately surrounding the ER complex buildings is paved with concrete or asphalt.

Vehicle access to the ER Commercial PCB Storage Facility is via east overhead access doors. Exterior concrete aprons abut the east asphalt-paved driveway.

B-4 EQUIPMENT

The ER Commercial PCB Storage ~~Facility~~ **area** contains a ~~work desk, first-aid cabinet, scale,~~ spill kits, ~~fire extinguishers~~, floor maintenance equipment, brooms, shovels, and an eyewash station.

All the equipment located in the ER Commercial PCB Storage ~~Facility~~ **area** will be disposed of in a licensed PCB landfill or other authorized PCB disposal facility at closure. Therefore, there will not be any equipment left in the ER Commercial PCB Storage ~~Facility~~ **area** requiring wipe sample screening or decontamination. ~~The equipment is one (1) drum cart, one (1) drum lifter, one (1) pallet, one (1) portable scale lifting slings two (2) to lift PCB transformer or electrical equipment and place on pallets for storage.~~

B-5 INSPECTIONS

Pursuant to 40 CFR Part 761.65(c)(5), all PCB Articles and PCB Containers in storage are checked for leaks at least once every 30 days, and any spill or leaked material is cleaned up immediately. Any sorbents or residue from the spill cleanup are disposed of as PCB per 40 CFR 761.60, and the leaking container is placed into a non-leaking container.

Inspections are recorded on Environmental Recycling, "PCB Storage Area Inspections Form" (see Appendix B.IV), and the completed inspection forms - complete with documentation of any corrective action - are compiled in an inspection log for future reference and for review by regulatory agencies.

C-1 SECURITY

ER 24000-square-foot building complex houses the general offices, Fluorescent Lamp Recycling Facility, Universal Waste and Commercial PCB Storage area. During working hours, admittance to the front offices is controlled electronically by the security system. The east secured entrance is monitored by the security system and fluorescent recycling operation personnel. The ER facility complex, including the east receiving area, is locked at all times when an authorized individual is not directly present and in control. Prior to normal working hours, entrance to the facility is controlled via a key entry mode with alarm admittance secondary safety access code provided only to authorized personnel. This keyless entry intrusion/fire alarm system is serviced and monitored by ~~Techni-Guard Alarm & Signal, Inc. 24/hours~~ **Habitec Security**.

When the facility is not manned (nights, weekends, and holidays), the ER facility telephone number

(419)-354-6110

is promptly answered by a telephone answering service that has the home telephone numbers and ~~beeper~~ **cell phone** numbers of key personnel, enabling the answering service to coordinate communications.

Accesses to the Commercial PCB Storage Facility will be posted with yellow-and-black "PCB Caution" placards. In addition, accesses to the ER Commercial Storage Facility Area are posted with "Authorized Personnel Only" signs. These signs are visible from all angles of approach and are legible from a distance of 25 feet. The two, steel-door entrances to the Commercial PCB Storage Facility are always locked and require a key to gain entrance. For worker safety, the entrances (exits) can be opened from inside the PCB area by simply turning the doorknob. Door keys to the PCB area are issued only to the PCB Supervisor, the PCB Technician, and the General Manager. All visitors and/or inspectors are provided with disposable boots if entering the PCB storage area and, if necessary, eye protection and a hard hat when touring the facility. The foot protection is removed at the entrances/exits to prevent the movement of potential chemical contaminants into the outer environment. Tours are provided during worker break periods to avoid chemical exposures.

PCB's are delivered to this site in licensed vehicles operated by ER Equipment Technicians (drivers) or by subcontracted carriers. Subcontracted carriers are permitted access to the ER facility complex only if prior arrangements have been made with ER management personnel and if they are cleared by the ER personnel upon arrival at the facility.

C-2 SAFETY EQUIPMENT

One properly labeled, excellently maintained drum, together with a bale of sorbent pads, are located inside the PCB storage area for use as a spill kit. Bags of floor dry are also maintained in the PCB storage area to be used as an absorbent for any spills of PCB liquids. (AGAIN THE LIKELYHOOD OF THIS ACCURRING IS MINIMAL SINCE ER WILL ONLY RECEIVE INTACT NON-LEAKING CONTAINERS) Additional supplies of sorbent pads, floor dry, and other spill control equipment are available in the ER equipment warehouse area.

ER personnel all have had experience as emergency-response contractors and, as such, have all of the tools and equipment to clean up a spill in the ER Commercial PCB Storage Facility. All personnel are supplied with their own personnel protective equipment and are trained in its proper use. This equipment includes, but is not limited to:

hard hat

splash goggles

full-face shield

chemical resistant coveralls

chemical resistant shoe covers

chemical resistant gloves

air-purifying respirator

An ABC dry-chemical fire extinguishers are available in the ER Commercial PCB Storage Facility. These fire extinguishers are monitored weekly for readiness via "quick check." An eyewash station is centrally located near the PCB storage area.

An industrial first-aid kit is located on the east wall near the ~~service desk~~ **shipping office**. ~~A locker containing safety equipment and disposable protective clothing is also located in the area~~.

Additional salvage drums, as needed for spill residues or for the over packing of leaking drums, are available within the complex. An intercom outside the PCB storage area provides access to the in-house public address system, contact with the front office, and access to outside phone lines.

Employees working in the in the ER Commercial PCB Storage Area are required to wear, at a minimum, safety glasses/goggles, coveralls, respirator (task specific), steel-toed shoes, and gloves.

C-3 HOUSEKEEPING and OPERATIONS PRACTICES

The ER Commercial PCB Storage Facility is well lighted and is kept in a very clean condition at all times. Aisles and passageways necessary for unobstructed movement of personnel and equipment are always maintained. PCB materials brought to this facility by properly licensed vehicles are properly labeled and manifested prior to pickup by ER vehicles or prior to delivery by subcontracted carriers. Containerized PCB wastes are recorded and weighed upon arrival at the site.

The PCB items in drums will be placed on pallets singles layer only, no stacking of material will occur. Non-leaking transformers will be placed in storage on pallets or on the dike floor area. PCB capacitors non-leaking will be placed on pallets, no stacking of materials will occur.

Surface contamination outside of the curbed/diked storage area will be monitored every three (3) months. Wipe samples will be taken from the area outside of the storage area leading to the offices and from the lunch room.

Any clothing and tools that come into direct contact with PCB's during the handling process and that cannot be decontaminated are packed in Department of Transportation (DOT) approved steel containers and are sealed, appropriately labeled, and shipped off-site for disposal.

In addition, all materials used to clean and maintain the ER Commercial PCB Storage Facility are packed either into sealed, appropriately labeled, DOT-approved steel containers or into triple-lined rolloff boxes and are shipped off-site for disposal as PCB wastes.

C-4 INSPECTIONS

Pursuant to 40 CFR Part 761.65(c)(5), all PCB Articles and PCB containers in storage are checked for leaks at least once every 30 days. (ER performs this check daily and records ~~weekly~~ **daily**.) Any spill or leaked materials are immediately cleaned up. Any sorbents or residues from the spill cleanup is properly disposed of as PCB's per 40 CFR 761.60~~(a)(4).~~ Leaking containers are properly overpacked in properly marked non-leaking containers.

All inspections are recorded on a "Environmental Recycling PCB Storage Area Inspection Form" (see Appendix C.I). The completed inspection forms are compiled in the inspection log for future reference and for regulatory agency inspections. Documentation of any corrective actions taken is maintained in the inspection log.

- Below is a percentage break down of maximum inventory content that ER may have at any given time and the disposal method for each item. The percentages were gathered using historical data from the annual reporting requirements.

CAPS	50-500 ELECTRICAL EQUIPMENT	>500 TRAN	PCB OIL DRUMS	PCB DEBRIS IN DRUMS	PCB WATER
5%	35%	5%	20%	32.5%	2.5%
INCINERATION	CHEMICAL WASTE LANDFILL & INCINERATION	CARCASS TO CHEMICAL WASTE LANDFILL OIL TO INCINERATION	INCINCERATION & DE-CHLOR	CHEMICAL WASTE LANDFILL	PHASE SEPERATION - CARBON TO CHEMIAL WASTE LANDFILL

A list of approved disposal vendors is listed below in section E-3

E-3 DISPOSAL OF INVENTORY

Disposal of all PCB items will follow the guidelines set forth in 40 CFR 761.60. The maximum volume of waste as described in Section E-3 will be disposed. Methods of disposal and processing procedures required for closure are discussed below. The designated PCB waste disposal facility for solids is US Ecology, Wayne Disposal facility located in Bellville MI. Liquids will be disposed of at Clean Harbors located in Twinsburg Ohio. The secondary facility is Veolia Environmental Services, Inc. located in Port Arthur, Texas. All PCB material will be sent to an approved TSCA facility for final disposal. Any miscellaneous equipment (e.g. pumps, hoses etc.) contaminated with PCB will be disposed at closure. Transportation shall be provide by 3rd party or disposal facility identified above.

ER does not have a definite final closure date; however, the date of closure is estimated to be the year ~~2020~~ **2045.** ER will notify the Regional Administrator or Director at least 60 days prior to the date on which final closure of its Commercial PCB Storage Facility is expected to begin. No PCB wastes will be received by ER 30 days prior to this estimated final closure date. Within 90 days of having received the final quantity of PCB's, ER will have removed all PCB wastes from this facility. Final closure of this facility will be within 180 days of having received the final quantity of PCB wastes. Within 60 days of completion of closure of the ER Commercial PCB Storage Facility, ER will submit to the Regional Administrator or Director, by registered mail, a certification signed by the owner and by an independent, registered professional engineer which states that the ER PCB storage area has been closed in accordance with the approved closure plan. Appendix E.I outlines the tasks to be accomplished for closure and provides an approximate schedule of final closure activities.

Clean Harbors **1302 West 38th Street** **Ashtabula, OH 44004-5434**	**Incineration/ Dechlorination**
Wayne Disposal ~~(EQ)~~ US Ecology **49350 N Interstate 94 Service** **Belleville, MI 48111-1854**	**Landfill**
EQIS **US Ecology** **26705 Northline Road** **Taylor, MI 48180**	**Clean up contractor**
Veolia **5959 Memorial Blvd** **Port Arthur, TX 77640**	**Incineration**
Lighting Resources **498 Park 800 Drive** **Greenwood, IN 46143**	**Reclamation**
Lighting Resources **1522 East Victory Street** **Phoenix, AZ 85040**	**Reclamation**

ER understands that it is considered the generator for all PCB wastes shipped off-site during closure and will comply with all aspects of the manifesting procedures as listed in 40 CFR 761.207.

During closure ER will contact the aforementioned incinerator and landfill services to obtain a PCB disposal-site approval number and ship the PCB wastes off-site within the 90-day period specified in 40 CFR 761.65 (e)(6)(iii). Assuming no unforeseeable circumstances, the incineration capacities and the land disposal capacities of facilities listed above should not decrease.

Procedures

Statistical sampling, decontamination activities (if required), and verification sampling procedures will be performed in these areas. All those areas below 6 feet within the ER Commercial PCB Storage Facility will be treated as high-contact industrial surfaces requiring a cleanup standard of 10 ug/100 cm^2 (as measured by standard wipe tests).

A pre-cleanup survey and screening sampling plan will be used to determine those areas within ER Commercial PCB Storage Facility which require decontamination (if any). Random sample locations will be chosen so that all of the containment surfaces have an equal chance of being selected. To choose the sampling locations, the height (to 6 feet) and total perimeter of the walls within ER Commercial PCB Storage Facility will be measured in feet. ~~Two random numbers, which are between zero and the total perimeter and between zero and the height and which represent the distance along the length and height of the walls to 6 feet, will be generated~~. A sample will be collected at this location. To choose the floor sampling locations, the width and length of the ER Commercial PCB Storage Facility floor area will be measured in feet. ~~Two random numbers, which are between zero and the length and between zero and the width and which represent the distance along the length and width of the floor area, will be measured~~. **Sampling will be conducted as described in Sections F-6 and F-7.** A wipe sample will be collected at this location. If wipe samples indicate area(s) with PCB concentrations above the regulated levels, statistical sampling grids based on a sampling scheme adapted from the Midwest Research Institutes "Verification of PCB Spill Cleanup by Sampling and Analysis" and "Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup" documents will be developed for these areas. Those wipe-sample areas indicating PCB concentrations above the 10 µg/100 cm^2 standard will be decontaminated with appropriate PCB soluble cleaners and re-sampled to verify compliance with the cleanup standard.

F-1c Concrete Access Approach Apron

The exterior east Concrete Access Approach Apron can be classified as high-contact industrial surfaces. The area of immediate concern is the concrete surface over which vehicles entering and leaving the covered ER Commercial PCB Storage Facility traverse. Since PCB materials have been associated with this areas, the numerical standards, the statistical sampling program, the decontamination procedures (if required), and the verification procedures necessary to certify the closure of these Concrete Access Approach Aprons will be performed in this area.

F-5 THE SAFETY PLAN

F-5a Introduction

This part of Section F is written to inform the survey/sampling team and the decontamination team of the potential hazards associated with PCB's and to establish standard operational procedures that are protective of both the workers' safety and the environment. The abbreviation "PCB's" refers to polychlorinated biphenyl's. PCB's are a family of man-made chemicals that contain 209 individual compounds. Because of their insulating and nonflammable properties, they have been used widely as coolants and lubricants in transformers, capacitors, and other electrical equipment. The industrial manufacture of PCB's was stopped in the United States in October 1970 because it had been discovered that PCB's would accumulate and persist in the environment and could cause toxic effects. Some commercial PCB mixtures are known in the United States by their industrial trade name, Aroclor.

F-5b Emergency Information

To respond quickly and appropriately to any expected or unexpected emergency during closure at ER requires the coordinated effort of a number of well-informed and trained individuals. The numbers given below for the ER health and safety officer(s) is assuming that ER will be managing the closure effort. If a third party is responsible for closure, the name and emergency numbers for the health and safety officer(s) will be modified to be reflective of this change.

~~Erik Thayer~~
Paul Cottrell
Health and Safety Officer
419-354-6110

~~Mike Dolkowski~~
Erik Thayer
Assistant Health and Safety Officer
419-354-6110

~~**Matt Zachary**~~
~~Assistant Health and Safety Officer~~
~~419-354-6110~~

Ambulance Service	911
Fire Department	911
Police Department	911

samples may be discarded until written permission is received relative to disposal of those samples.

F-8b(xx) Laboratory Analyses

The laboratory will conduct all analyses in accordance with U.S. EPA's SW-846 "Test Methods for Evaluating Solid Waste" 3rd Ed. Nov. 1986. These procedures incorporate stringent quality-control requirements and describe precision, accuracy, calibration criteria, internal standards, and method-detection limits. The following methods as listed in SW-846 will be used to test for PCB's:

Scrape/Destructive

Parameter	SW-846 Method
PCB's Aroclors 1016,1221 1232, 1242, 1248 1254 and 1260	~~8080~~ **8082A**

Wipe Samples

Parameter	SW-846 Method
PCB's Aroclors 1016,1221 1232, 1242, 1248 1254 and 1260	~~8080~~ **8082A**

F-9 DECONTAMINATION PROCEDURES

Decontamination procedures for PCB's will only be implemented at the ER facility if the statistically valid screening samples uncover that there are individual sites of contamination or if the screening samples indicate that the entire facility has levels of PCB contamination above the regulated levels. If all the screening samples prove to be below the regulated levels, the site is "clean" and decontamination will not be needed. In this instance it would be up to the owner or operator of ER to decide if they want to clean the facility further.

If, on the other hand, the screening samples indicate areas that are above the regulated levels, those areas will be decontaminated. To determine the extent of the contamination, ER or the third-party consulting firm will establish a sampling grid about the "hot spot" and perform additional sampling to determine the extent of the contamination.

~~Chemical Waste Management — Landfill~~
~~Emelle Facility~~
~~Alabama Hwy. 17 at Mile Marker 162~~
~~Emelle, Alabama 35459~~

Chemical Waste Management — Landfill
1550 Balmer Road
Model City, New York 14107

~~USPCI — Landfill~~
~~Grassey Mountain Facility~~
~~3 Miles East, 7 Miles North of~~
~~Knolls, Utah (Exit 41 on I-80)~~

~~U.S. Ecology — Landfill~~
~~P.O. Box 578~~
~~Beatty, Nevada 89003~~

~~APTUS~~
Clean Harbors — Incinerator
Highway 169 North
P.O. Box 1328
Coffeyville, Kansas 67337

~~Rollins Environmental~~ — Incinerator &
Clean Harbors
P.O. Box 609 — Cleanup Contractor
Deer Park, Texas 77536

TCI, Inc. — Reclamation
101 Parkway East
Pell City, AL 35125

Clean Harbors — **Reclamation**
1672 Highland Road
Twinsburg, OH 44087-2219

Clean Harbors — **Incineration/**
1302 West 38th Street — **Dechlorination**
Ashtabula, OH 44004-5434

Wayne Disposal (~~EQ~~) US Ecology — **Landfill**
49350 N Interstate 94 Service
Belleville, MI 48111-1954

EQIS US Ecology 26705 Northline Road Taylor, MI 48180	Clean up contractor
Veolia 5959 Memorial Blvd Port Arthur, TX 77640	Incineration
Lighting Resources 498 Park 800 Drive Greenwood, IN 46143	Reclamation
Lighting Resources 1522 East Victory Street Phoenix, AZ 85040	Reclamation

F-11 OTHER CLOSURE ACTIVITIES

All liquid PCB wastes stored at the ER Commercial PCB Storage Facility are stored within the confines of the specially designed, completely enclosed containment areas. All loading and unloading activities involving these liquid wastes are carried out within the confines of the containment structures. Any leaks are quickly cleaned up and the area decontaminated by attending personnel. Weekly inspections assure that the integrity of the facility is not breached. The internal containment area is always kept in a very clean and dry state. Periodic sampling of the facility floors have revealed levels of PCB below the regulatory standard of 10 ug/100 cm2 (see Appendix B.II)

Based on these standard operating practices, ER does not expect to find PCB above regulated levels in the exterior environment above natural background levels. Therefore, groundwater monitoring will not be required.

F-12 SCHEDULE FOR CLOSURE

ER does not have a definite final closure date, but the date of final closure of the ER Commercial PCB Storage Facility is estimated to be the year ~~2020~~ **2045**. ER will notify the Regional Administrator or Director at least 60 days prior to the date on which final closure of its PCB-storage facility is expected to begin. No PCB wastes will be received by ER 30 days prior to this estimated final closure date. Within 90 days of having received the final quantity of PCB's, ER will have removed all PCB wastes from this facility. Final closure of this facility will be within 180 days of having received the final quantity of PCB wastes. Within 60 days of completion of closure of the ER Commercial PCB Storage Facility, ER will submit to the Regional Administrator or Director, by registered mail, a certification signed by the owner and by an independent registered professional engineer that states that the ER Commercial PCB Storage Facility has been closed in accordance with the approved closure plan. Appendix E.I outlines the task to be accomplished for closure and provides an approximate schedule of final closure activities.

F-13 MODIFICATION TO CLOSURE PLANS

In accordance with 40 CFR 761.65 (e)(4), ER will submit to the Regional Administrator or Director a written request whenever there is a need for a modification to its storage approval to amend its closure plan. A request will be submitted whenever:

1. There is a change in ownership, operating plans, or facility design, which affects the existing closure plan.

2. There is a change in the expected date of closure, if applicable.

FINAL CLOSURE COST ESTIMATE FOR THE ER COMMERCIAL RECYCLING FACILITY

Storage Area

~~1. 50 Drums of Fluorescent Light Ballasts~~
~~50 drums at $65.00 each $3250~~

~~2. PCB article containers~~
~~10 drums approximately 250 pounds each~~
~~10 drums X 250/lbs X $0.90 $2250~~

~~3. 1 Drum decon water $250~~

~~4. PCB-contaminated electrical equipment~~
~~5 units~~
~~5 units X $25/unit $125~~

~~5. PCB transformers~~
~~(1) 125 cubic foot unit~~
~~(1) 125 ft3 X $5.50/ft3 $688~~

~~6. PCB Storage Area Equipment~~
~~(1) cubic yard box $125~~

~~**Subtotal Storage Areas Disposal Costs $6688**~~

~~**Transportation Costs (10% of Subtotal) $669**~~

~~**TOTAL STORAGE AREAS DISPOSAL COSTS $7357**~~

Disposal inventory and costs

PCB STORAGE AREA CONTENTS	MAX INVENTORY	TOTAL COST OF DISPOSAL
CAPS	1 DRUM (250 LBS)	$400.00
ELECTRICAL EQUIPMENT (LANDFILL) BALLASTS, SMALL CAPS. MISC ITEMS	14 DRUMS	$1,400.00
ELECTRICAL EQUIPMENT (INCINERATION) BALLASTS, SMALL CAPS, MISC. ITEMS	7 DRUMS (2450 LBS)	$1750.00
>500 TRANS	5 UNITS	$3,800.00
50-499 PCB OIL DRUMS (DE-CHLOR)	13 DRUMS	$4,900.00
PCB OIL DRUMS (INCINERATION)	6 DRUMS	$3,250.00
PCB DEBRIS DRUMS	25 DRUMS (6250 LBS)	$400.00
PCB WATER DRUMS	6 DRUMS (330 GAL)	$2,100.00
INVENTORY REMOVAL FROM STORAGE	2 TECHS - 2 HOURS	$150.00
DISPOSAL TOTAL		**$18150.00**
TRANSPORTATION FEES	10%	$1,815.00
TOTAL INCLUDING LABOR, DISPOSAL AND TRANSPORTATION		**$19,965.00**

Calculations are based on maximum daily inventory that ER may have at any given time. This data in direct correlation with section E-2 (Maximum Inventory) of this storage permit application.

All disposal cost estimates are reflective of the current dollar value for labor, equipment Rental, use, replacement, and transportation/disposal.

Cleaning, Disposal, Sampling Costs

1. Decontamination, of the interior ~~45' X 30'~~ area and access approach aprons.

   (Assumes that the both the interior and access approach aprons need decontamination.)

~~Estimate 1 days @ $200/day~~ ~~$200~~

Estimate 1 day

2-Man crew 8 hours (16 Hours total)	**@ $40.00/hour**	**$640.00**
1-Supervisor 8 hours	**@ $55.00/hour**	**$440.00**
1-Safety Coordinator 8 hours	**@ $65.00/hour**	**$520.00**
3000 PSI Pressure Washer	**@ $250.00/day**	**$250.00**
Decon Fluid 10 gallons	**@ $5.00/Gal**	**$50.00**
4-PPE (Level D)	**@$20.00/person**	**$80.00**
Miscellaneous expendable supplies	**1 Lot**	**$250.00**

Total - (Decon of storage area and approach) **$2,230.00**

***Disposal of cleaning wash waters in disposal cost already calculated above (PCB water)**
***Disposal of cleaning solid materials in disposal cost already calculated above (Solids)**

2. Pre-cleanup screening samples and analysis

   Estimate 2-man crew 4 hours
   @ $40.00/hr/man $160 $320

   85 sample bottles and analysis (pre cleanup)
   @ average cost of $45.00/per analysis $3825

3. Post cleanup wipe/scrape samples and analysis

   Estimate 2-man crew 4 hours
   @ $40.00/hr/man $160 $320

   85 sample bottles and analysis (post cleanup)
   @ average cost of $45.00/per analysis $3825

4. One drum disposable cleanup items
   (solids) @ $65/drum $65

Total for pre and post sampling $8,355.00

(Contents of these drums include such items as personal protective equipment, templates, brooms, squeegees, absorbents pads, gloves, overboots, etc., which were used during the screening sampling phase of closure and, assuming the worst, those items used during the decontamination and verification sampling of the PCB storage areas.)

5.	If need estimated (1) 20 cubic yard box (solids) concrete/soil	$2300
TOTAL ESTIMATE CLEANUP		**$12,885**

SUBTOTAL OF CLOSURE COSTS	$32,850
Documentation and Certification 10% of Subtotal	$3,285.00
Contingency 10% of Subtotal	$3,285.00
TOTAL ESTIMATE FOR CLOSURE OF ER's COMMERCIAL PCB STORAGE FACILITY	**$39,420**

Paul Cottrell-President
Erik Thayer-Vice President/Secretary
(all equally own and operate ER)

3c Persons Responsible for the Overall Operations of the Facility and Supervisory Employees Responsible for the Operation of the Facility

~~Mike Dolkowski-CECM~~
~~Environmental Engineer~~
~~President~~

~~Erik Thayer-Chemist~~
~~Facility Manager~~
~~PCB Coordinator~~

~~Paul Cottrell~~
~~Civil Engineer~~
~~Transportation/Personal~~

Paul Cottrell
Civil Engineer
President

Erik Thayer-Chemist
Vice President
Secretary

~~**Matt Zachary**~~
~~**Facility/PCB Manager**~~
~~**Transportation/Personal**~~

3d Technical Qualifications and Experience of Persons Responsible for the Overall Operations of the Facility and Employees Responsible for Handling PCB Waste

Technical qualification statements are provided in Appendix I, for those individuals identified above.

3e Past State or Federal Environmental Violations Involving ER or Another Business With Which the Principals or Supervisory Employees Were Affiliated Directly (within five [5] years preceding the submittal of this application/**Renewal** and which related directly to violations that resulted in either a civil penalty or judgment of conviction or civil injunctive relief and involved storage, transport, or other waste-handling activity)

During the past five (5) years, ER. has not received any state or federal environmental judgments of conviction.

3f In accordance with 40CFR 761.65(d)(3)(v), provided is a list of all companies currently owned or operated in the past by the principals or key employees identified in paragraph 3c.

SQS, Inc. dba ERG Environmental Services
13040 Merriman
Livonia, MI 48150

SQS, Inc. dba ERG Environmental Services does not manage PCB wastes. The facility does not have any permits or required closure plans.