US EPA ARCHIVE DOCUMENT

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

REPLY TO THE ATTENTION OF:

OCT 25 2017

Cynthia Orms
President
Evergreen Services & Consulting, Inc.
111 Annette Way NE
Milledgeville, Georgia 31061

Re: Notice of Deficiency on the PCB Commercial Storage Permit Application for the TCI Facility in Richwood, Ohio

Dear Ms. Orms:

The U.S. Environmental Protection Agency has received the polychlorinated biphenyl (PCB) Commercial Storer Permit Application dated September 7, 2017, for the Trans-Cycle Industries of Ohio, LLC (TCI) facility in Richwood, Ohio.

EPA has reviewed the application which was submitted by Evergreen Services & Consulting, Inc., on behalf of TCI for a PCB commercial storage approval under 40 Code of Federal Regulations (CFR) 761.65(d) for the TCI facility located at 150 Ira Bean Parkway, Richwood, Ohio. Under § 761.65(d)(2)(vi), the EPA may approve the 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 does not provide sufficient information 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, the comments provided in the attachment to this letter will need to be addressed.

At this time, EPA requires a response to the comments in the attachment to complete the review and processing of the 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 the 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.

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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 PCB Commercial Storage Permit Application for the TCI Facility in Richwood, Ohio

cc: Lisa Graczyk, EPA, RCRA/TSCA Programs Section (LR-17J)
Susan Prout, EPA, ORC (C-14J)
George Jackson, TCI

ATTACHMENT

EPA Comments on the PCB Commercial Storage Permit Application for the TCI Facility in Richwood, Ohio

The following comments are based on review of the polychlorinated biphenyl (PCB) commercial storage application dated September 7, 2017, for the Trans-Cycle Industries of Ohio, LLC (TCI) facility located at 150 Ira Bean Parkway, Richwood, Ohio. The review was conducted to determine whether the Approval Application meets the requirements of 40 Code of Federal Regulations (CFR) Part 761. These comments describe the information that is missing or that require clarification in the Approval Application.

Comments on Commercial Storage Application

1. Include the EPA Identification Number in the revised application.
2. Provide an introduction that gives an overview of the operations at the facility. Include copies of any standard operating procedures (SOP) that describe TCI's procedures for transformer acceptance and processing including sampling and analysis of transformer oil. Include procedures for tracking the date of removal from service for disposal, laboratories to be used, and procedures for draining PCB oil, if applicable.
3. Describe TCI's inspection procedures of the PCB Items in the PCB storage area at the Richwood, Ohio facility. Alternatively, TCI may include any inspection forms or SOPs for inspection procedures as attachments if TCI has these available. See § 761.65(c)(5).
4. Describe the location of any sewers on or adjacent to the facility property. Also, describe the surface water runoff flow pattern. Alternatively, a map can be submitted that depicts this information.
5. Provide a copy of the Contingency Plan and the Health and Safety Plan for the facility. In addition, provide copies of any other emergency response or spill cleanup procedures that TCI will use at the facility.
6. Does Trans-Cycle Industries of Ohio, LLC have a parent company? If so, what is the name of the parent company? If available, please submit a corporate structure diagram.
7. **Section II, Operations & Management of Facility Organizational Chart.** Clarify if Frank Jackson will be at the Richwood, Ohio facility supervising operations when it opens. If not, provide information on this person when available.
8. **Section VI, Estimate of Maximum PCB Waste Quantities to be Handled by the Facility.** Clarify if all the PCBs and PCB Items listed in the table are to be stored in Area 1. This needs to be made clear in this section.
9. **Section VI, Estimate of Maximum PCB Waste Quantities to be Handled by the Facility**. Clarify what the 80,000 pounds of solids and debris will consist of.
10. **Section IX, Closure Cost Estimate.** Include the following in the Closure Cost Estimate:

a. rental costs for heavy equipment;

b. fuel for the heavy equipment; and

c. container costs for detergent/water from cleanup.

11. **Section X, Financial Responsibility.** Include the type of financial instrument that TCI intends to use for financial assurance.

Comments on Closure Plan

12. **Section 1.1, Introduction.** This section states that the "Director of the Office of Resource Recovery and Conservation will be notified at least 30 days prior to the date TCI expects to begin final closure." Change "Director of the Office of Resource Recovery and Conservation" to "EPA Regional Administrator." Also, change "30 days" to "60 days." See § 761.65(e)(6)(i).

13. **Section 1.2, Final Closure Activities.** This section states cleanup levels for both high-occupancy areas and low-occupancy areas. Clarify in this section which cleanup level is to be used. Note that if the low-occupancy cleanup standard is used, then a deed restriction will likely be required.

14. **Section 3.1, Facility Layout and Description.** In accordance with § 761.65(b)(1)(iii), confirm that the PCB storage area does not contain drain valves, floor drains, expansion joints, sewer lines, or other openings that would permit liquids to flow from the curbed area.

15. **Section 3.3, Bulk Storage Tanks.** Provide clarification in Section 3.3 as to what material the bulk storage tanks will contain.