

US EPA ARCHIVE DOCUMENT

# COMMERCIAL STORER PERMIT APPLICATION

**TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

Prepared For:

**TRANS-CYCLE INDUSTRIES OF OHIO, LLC  
150 IRA BEAN PARKWAY  
RICHWOOD, OHIO 43344  
EPA ID: OHW000205856**

**DATE REVISED: 11/18/17**

Prepared By:

**Evergreen Services & Consulting, Inc.  
111 Annette Way NE  
Milledgeville, Georgia 31061**

***TRANS-CYCLE INDUSTRIES OF OHIO, LLC***  
**COMMERCIAL STORER PERMIT APPLICATION**  
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# SECTION I

## TRANS-CYCLE INDUSTRIES OF OHIO, LLC

150 Ira Bean Parkway  
Richwood, Ohio 43344

### OWNERS & OPERATORS OF THE FACILITY 40 CFR 761.65(d)(3)(i)

Name	Title	Ownership %
George Jackson	Member	10
Frank Jackson	President	10
Ben Bodie	Member	2
Brian Hemlock	Member	2
Jeffrey Lefkovits 2012 Trust #1	Member	25.333
George Newmark 2012 Trust #1	Member	25.333
Jerry and Janice Coleman Trust	Member	4.331
Odas Coleman	Member	2.004
Revocable Trust W. Rosenfeld	Member	18.999
	<b>Total</b>	<b>100</b>

# **SECTION II**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

**OPERATIONS & MANAGEMENT OF FACILITY  
ORGANIZATIONAL CHART  
40 CFR 761.65(d)(3)(ii)**

NAME & TITLE	PRIMARY RESPONSIBILITIES	YEARS WITH TCI	OTHER WORK EXPERIENCE	EDUCATIONAL BACKGROUND
<b>FRANK JACKSON</b> President	Responsible for overall facility operations, sales, managing sales force, submittal of bids, and marketing	8	Crane Operation 4 years Rigging, lifting and crew management	Licensed Aircraft Mechanic A&P Rating Certified Crane Operator, Rigging, and Lifting West Georgia College – 1yr
<b>PRODUCTION</b> To be named <sup>1</sup>	Responsible for overall management of plant operations to include Quality Control, Environmental Compliance and Waste Tracking.			
<b>TRANSPORTATION</b> To be named <sup>1</sup>	Coordination of transportation for movement of incoming and outgoing waste			
<b>HEALTH &amp; SAFETY</b> To be named <sup>1</sup>	Responsible for overall management of on-site and off- site operations concerning Health and Safety			
<b>CUSTOMER SERVICE</b> To be named <sup>1</sup>	Customer service, manifesting, scheduling of incoming shipments, sales assistant			

**NOTES:**

<sup>1</sup>In the initial start-up phase, the facility will be supported by TCI of AL, LLC personnel. Once new employees are trained, they will be named to the specific positions.

**Frank Jackson**  
**President**

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**Summary**

Over eight years of successful experience in all phases of field dismantling including management of regional field crews, shipping, receiving, budgets, and inventory.

**Experience**

**Site Services Manager** 2008 - Present  
TCI of Alabama, LLC - Pell City, AL

- Responsible for hiring, motivating, and training crew to properly dismantle electrical equipment
- Works directly with sales and accounting executives on estimating and budgeting teardown projects

**Millwright & Crane Operator**, 2000 - 2008  
Southway Crane Services – Atlanta, GA

- Responsible for installation of equipment for City of Atlanta water purification system

**Education**

Atlanta Metropolitan College, Atlanta, GA

Aviation Engineering /Mechanics

West Georgia College, Carrollton, GA

Business Education

# **SECTION III**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

**TECHNICAL QUALIFICATIONS & TRAINING SCHEDULE  
OF PLANT PERSONNEL  
RESPONSIBLE FOR PCB HANDLING  
40 CFR 761.65(d)(3)(iii)**



NAME	EMPLOYEES REQUIRING TRAINING	FREQUENCY
Plant Orientation	All employees	Initially
Plant Rules & Safety Policies	All employees	Initially/Throughout the year*
Hazard Communication	All employees w/potential chemical exposure	Initially/Throughout the year
Asbestos & Lead Awareness	All exposed employees	Initially/Annually
PCB Hazard Awareness	All Employees w/potential PCB	Initially/Throughout the year
Confined Space	All affected employees	Initially/Annually
Fall Protection	All affected employees	Initially/Throughout the year
Lockout Tagout Affected Employee	All affected employees	Initially/Throughout the year
Lockout Tagout Authorized Employee	Maintenance/Equipment operators who may inspect, clean, or adjust machinery	Initially/ Throughout the year
Mobile Equipment & Pedestrian Safety	All employees	Initially/Throughout the year
Forklift & Skid Steer Safety	All employees	Initially/Throughout the year
Spill Prevention Control and Countermeasure	All employees	Initially/Throughout the year
Hearing Conservation	All employees	Initially/Throughout the year
Personal Protective Equipment	All exposed employees	Initially/Throughout the year
Fire Extinguisher	All employees	Initially/ Annually
Ladder Safety	All affected employees	Initially/Annually
Cranes, Chains & Slings	All affected employees	Initially/Annually
Respiratory/Respirators	All affected employees	Initially/Throughout the year
Compressed Gas Cylinders	All affected employees	Initially/Annually
Electrical Awareness	All employees	Initially/Annually
General Safety Meeting	All employees	Monthly

# SECTION IV

## TRANS-CYCLE INDUSTRIES OF OHIO, LLC

150 Ira Bean Parkway  
Richwood, Ohio 43344

### DISCLOSURE OF STATE AND/OR FEDERAL ENVIRONMENTAL VIOLATIONS 40 CFR 761.65(d)(3)(iv)

#### Facility:

TCI of Alabama, LLC

TCI entered into a consent Agreement with EPA, November 12, 2012

#### Affiliated Companies:

Transformer Technologies, LLC

Warning Letter with Opportunity to Correct  
Oregon Department of Environmental Quality  
Dated: February 16, 2016  
Letter Verifying Issues Resolved  
Date: March 17, 2016

No other affiliated companies have any State and/or Federal violations on record within the last 5 years.

# SECTION V

## TRANS-CYCLE INDUSTRIES OF OHIO, LLC

150 Ira Bean Parkway  
Richwood, Ohio 43344

### DISCLOSURE OF AFFILIATED COMPANIES 40 CFR 761.65(d)(3)(v)

#### G&S MOTOR EQUIPMENT CO, INC.

6250 Gorman Rd.  
Henrico, VA, 23231  
EPA ID No.: VAR000530311

#### G&S MOTOR EQUIPMENT CO., INC.

1800 Harrison Avenue  
Kearny, NJ 07032  
EPA ID No.: NJD011370525

#### HYDRODEC OF NORTH AMERICA, LLC

2021 Steinway Blvd. S.E.  
Canton, OH 44707  
EPA ID No.: OHR000143263

#### TCI of NY, LLC

PO Box 936  
99 Coeymans Industrial Park Lane  
Coeymans NY 12045  
EPA ID No: NYR000211540

#### TRANSFORMER TECHNOLOGIES LLC

4705 Turner Road SE  
Salem, Oregon 97301  
EPA ID No: ORQ000026715

# SECTION VI

## TRANS-CYCLE INDUSTRIES OF OHIO, LLC

150 Ira Bean Parkway  
Richwood, Ohio 43344

### ESTIMATE OF MAXIMUM PCB WASTE QUANTITIES TO BE HANDLED BY THE FACILITY 40 CFR 761.65(d)(3)(vi)

Category	Regulatory Levels	Quantity
PCB-contaminated Articles with fluid	$\geq 50$ - $< 500$ ppm	100,000 P containing 4,000 G fluid
PCB-contaminated Articles drained	$\geq 50$ - $< 500$ ppm	10,000 P
Assumed PCB Articles with fluid	$\geq 500$ ppm	425,000 P containing 24,000 G fluid
PCB Articles with fluids	$\geq 500$ ppm	40,000 P containing 2,000 G fluid
PCB Articles drained	$\geq 500$ ppm	10,000 P
PCB-contaminated fluid	$\geq 50$ - $< 500$ ppm	4500 G
PCB debris/solids	$\geq 50$ ppm	80,000 P

LEGEND: P = pounds; G = Gallons

#### Storage & Handling of PCB Articles:

- All items shown above will be stored in Area I – PCB Commercial Storage Area pending shipment off-site to a facility for disposal and/or recycling.
- Any items received as assumed PCB will be tested upon receipt at the facility.
- Any items testing  $< 50$  ppm PCBs will be removed to Area II for storage and processing.
  - Manifests will be corrected accordingly and appended with associated analytical data.
- Any items testing  $50$  -  $< 500$  ppm PCBs will have manifests corrected accordingly with associated analytical data appended thereto, but will remain in Area I awaiting shipment for recycling and/or disposal.
- No storage or processing of  $\geq 50$  ppm PCBs will take place in Area II.
- In the event of a spill or leak of a regulated item, TCI will, upon discovery, initiate cleanup of the PCB or PCB contaminated article and all affected areas in accordance with the PCB Spill Cleanup Policy as per 40 CFR 761, Subpart G.
  - Any wastes generated during spill cleanup will be treated as PCB waste and handled in accordance with 40 CFR 761, Subpart D.
  - If necessary, the PCB article may require draining to stop the leak or spill. The drained fluids will be stored in 55 G DOT/UN approved drums awaiting transportation and disposal/recycling as per 40 CFR 761, Subpart D.

## SECTION VII

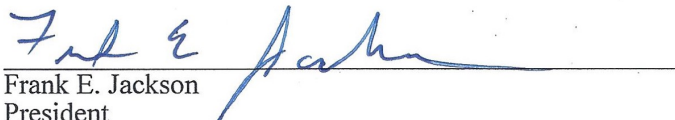
### TRANS-CYCLE INDUSTRIES OF OHIO, LLC

150 Ira Bean Parkway  
Richwood, Ohio 43344

#### CERTIFICATION OF COMPLIANCE 40 CFR 761.65(d)(3)(vii)

#### NEED TO EXECUTE

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615), I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete.

  
Frank E. Jackson  
President  
Trans-Cycle Industries of Ohio, LLC

8-29-17  
Date

# **SECTION VIII**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

**CLOSURE PLAN  
40 CFR 761.65(d)(3)(viii)**

**ATTACHED AS SEPARATE DOCUMENT**

# **SECTION IX**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

### **CLOSURE COST ESTIMATE**

**40 CFR 761.65(d)(3)(ix)**

**CLOSURE COST ESTIMATE**

The Closure Costs Estimate has been developed to ensure that adequate funds along with a viable financial instrument will be available to pay for costs in the event that TCI is unable to complete closure. A summary of the estimated costs of employing a third party to implement all closure activities is provided.

Item	Description	Quantity	Unit	Unit Rate	Amount
1	Removal of Inventory (Labor):	210	MH	\$55	\$11,550
	-- Loading trucks -- 36 MH				
	-- Sample Collection -- 30 MH				
	-- Clean/Decontamination of Walls, Ceilings, & Equipment - 120 MH				
	-- Crush drums using skid steer/forklift - 4 MH				
	-- Cleaning of Floors -- 20 MH				
2	Equipment Rental for loading of inventory (5 days/1 week)	1	W	\$ 2,480.00	\$ 2,480.00
3	Fuel for Equipment loading Inventory	30	G	\$ 2.50	\$ 75.00
4	DOT/UN Drums for used detergent/water	10	EA	\$ 24.86	\$ 248.60
5	Transportation of PCB & PCB Contaminated Articles & Drums to EPS, WV	16	L	\$3,050.00	\$48,800
6	Disposal of PCB-contaminated Articles to EPS, Wheeling, WV	110,000	P	\$0.10	\$11,000
7	Disposal of PCB Articles to EPS, Wheeling, WV	465,000	P	\$0.60	\$279,000
8	Disposal of PCB Articles (drained) to EPS, Wheeling, WV	10,000	P	\$0.35	\$3,500
9	Disposal of PCB-contaminated fluid in drums to EPS, Wheeling, WV	90	D	\$75.00	\$6,750
10	Transportation of PCB debris/solids to WM, Emelle, AL	2.5	L	\$2,900	\$7,250
11	Disposal of PCB debris/solids to WM, Emelle, AL (80,000 lbs)	40	T	\$105.00	\$4,200
12	Transportation of PCB debris/solids from cleanup to WM, Emelle, AL	Incl 7 above	--	--	--
13	Disposal of PCB debris/solids from cleanup by WM, Emelle, AL (1700 lbs)	0.85	T	\$105	\$89
14	Transportation of detergent/water from cleanup to Veolia, TX (500 G)	0.1	LTL	\$ 4,790.00	\$479
15	Disposal of detergent/water from cleanup to Veolia, TX (500 G)	4150	P	--	\$2,000
16	Detergent/Solvent for decontamination	--	--	--	\$500
17	Personal Protective Equipment for on-site cleanup personnel	--	--	--	\$1,000
18	Sample Analysis (Wipe)	336	S	\$55	\$18,480
19	Sample Analysis (Grab)	37	S	\$75	\$2,775
20	Sample Analysis (Core)	17	S	\$75	\$1,275
21	Engineering Oversight & Supervision	--	--	--	\$5,000
				<b>SUBTOTAL</b>	<b>\$406,452</b>
22	Certification of Closure (10%)	--	--	--	\$40,645
23	Contingency (10%)	--	--	--	\$40,645
				<b>TOTAL</b>	<b>\$487,742</b>
<b>LEGEND: M - Manhours; W = Week; EA = Each; G = Gallons; L = Full truckloads; LTL - Less than a truckload; P = Pounds; T = Tons; S = Samples</b>					



# **SECTION X**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

### **FINANCIAL RESPONSIBILITY**

**40 CFR 761.65(d)(3)(x)**

A Letter of Credit will be used as the funding instrument.

It will be issued upon receipt of notice by U.S. EPA Region 5 that the Closure Plan and Costs are approved.

# SECTION XI

## TRANS-CYCLE INDUSTRIES OF OHIO, LLC

150 Ira Bean Parkway  
Richwood, Ohio 43344

### SURFACE & GROUNDWATER INFORMATION

#### A. Proximity to Surface Waters

There are no surface water bodies on the property with only a roadway drainage ditch along the northern property boundary adjacent to Tawa Road.

#### B. Proximity to Private or Public Drinking Sources

A well is located on-site near the southwest corner of the building. The facility is connected to the Village of Richwood community public water system. The Village of Richwood water system operates 2 wells that pump approximately 162,000 gallons of water per day from a dolomite aquifer (water-rich zone) specifically the "Newburg Zone," which is a highly fractured portion of the Silurian Greenfield Formation (Roadcap and Bair, 1990). The dolomite bedrock is covered by 8 to 10 feet of low-permeability material overlying 20 to 30 feet of sand and gravel, which provides minimal protection from contamination. Depth to water in the aquifer is 10 to 15 feet below the ground surface. Soils in the area are silty loams which are moderately well-drained, meaning that much of the rainfall and snowmelt will infiltrate into the soil, instead of running off or ponding. The topography of the area is relatively flat. Ground water is replenished by the gradual flow of water underground from higher to lower elevations and by precipitation that infiltrates through the soil. At the Village of Richwood wellfield, ground water flows generally toward the east, based on a water table elevation map completed by Roadcap and Bair (1990). There are 25 known private wells within 1 mile of the facility.

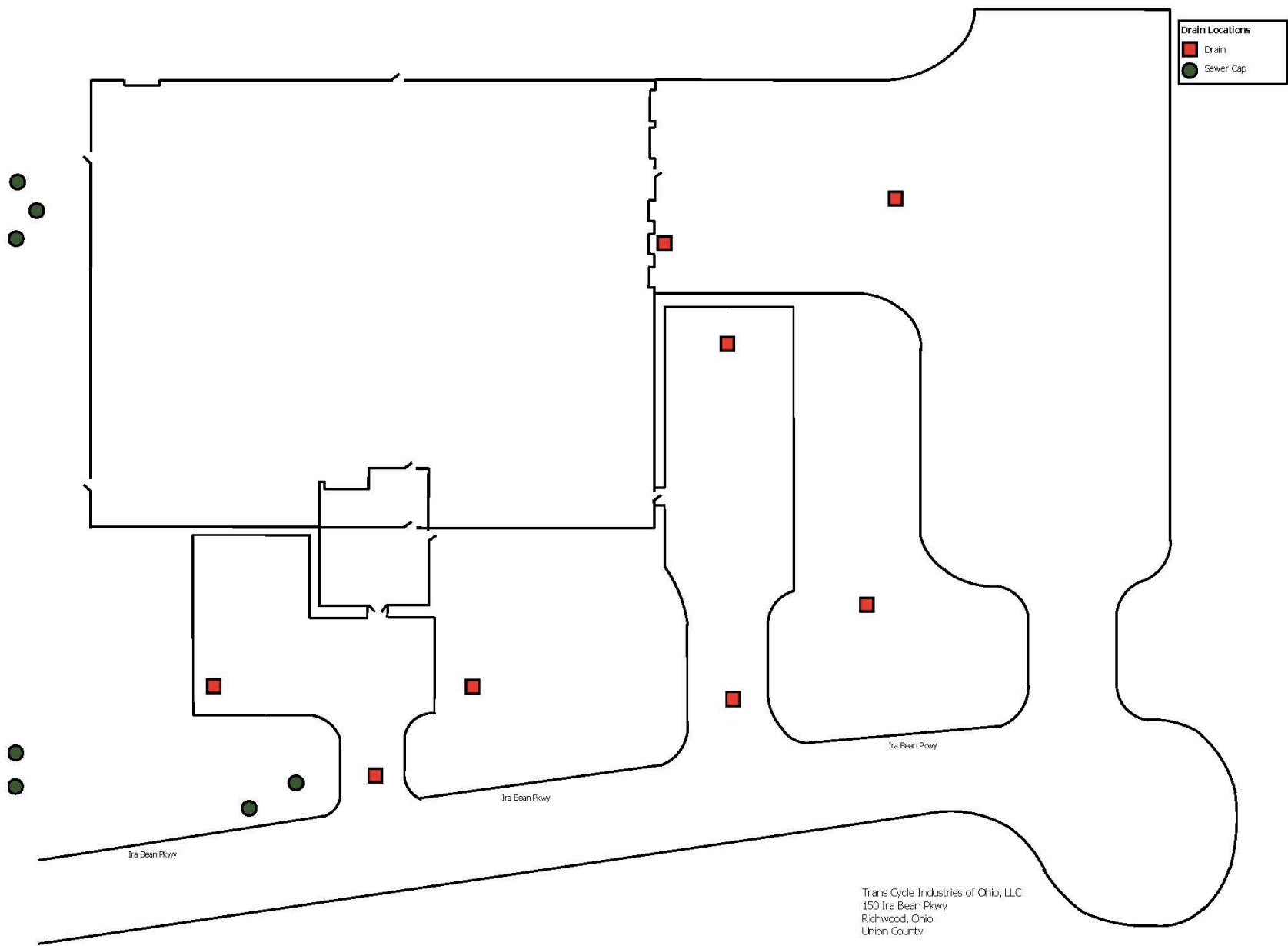
#### C. Groundwater

The geology in the area of the tract is dominated by rocks of the Silurian era (Geologic Map of Ohio, State of Ohio Geological Survey). Rocks encountered in this area would generally consist of sedimentary rocks such as dolomite, anhydrite, gypsum, salt, and shale. The hydrogeological system in the area of the subject property includes both the surficial sediments and underlying bedrock. Groundwater in sediments is present in pores between individual sediment grains. In bedrock, groundwater is present predominantly in horizontal and sub-horizontal unloading fractures, and in near, vertical stress fractures. Groundwater depths are variable and generally approach ground surface near streams and rivers. Based on the historical groundwater flow characteristics in the area, groundwater flow typically mirrors surface topography. Groundwater flow on the subject property would be west to east. There are no facilities located upgradient that could be considered potential sources of subsurface soil and groundwater environmental contamination on the property.

#### D. Surface Water Runoff Flow Pattern

The flow pattern in the front parking lot would flow towards the drain next to Ira Bean Parkway and the remaining drains only cater to the immediate 10 feet surrounding based on angle of property. The entire lot is flat. The flow pattern for the two drains in the tanker access area are in a flat area and would only drain from the immediate area. The remaining drains on the right side, behind the loading docks, angle toward the building and the drain at the outside base of the loading doors would receive the most runoff. All water drains flow to the water pond located at the entrance to Ira Bean Parkway. A Drain Map follows.

PROPERTY DRAIN MAP



# **SECTION XII**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

### **STANDARD OPERATING PROCEDURES**

**(ATTACHED AS SEPARATE DOCUMENTS)**

**Receiving and Accepting Shipments for Processing & Storage**

**Sampling & Wipe Testing**

# **SECTION XIII**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

**HEALTH & SAFETY PLAN  
(ATTACHED AS SEPARATE DOCUMENT)**

# **SECTION XIV**

## **TRANS-CYCLE INDUSTRIES OF OHIO, LLC**

**150 Ira Bean Parkway  
Richwood, Ohio 43344**

**CONTINGENCY PLAN - DRAFT  
(ATTACHED AS SEPARATE DOCUMENT)**