

US EPA ARCHIVE DOCUMENT

**TRANS CYCLE INDUSTRIES OF OHIO, LLC**  
**Environmental, Health, & Safety Program**

<b>Subject:</b>  Receiving & Accepting Shipments for Processing or Storage	<b>SOP No.</b>  800-310	<b>SECTION</b>  Facility - General
	<b>Date Reviewed</b> 11/18/2017	<b>Pages</b> 7
<b>Reviewed by: Michelle Botter-Lee, EHS Director</b>		
<b>Approved by: Frank Jackson, President</b>		

Synopsis: Provision for accepting and receiving items and materials into the facility that verify compliance with applicable requirements, including inspection method, acceptance criteria, recordkeeping, labeling, marking, and storage.

## **1.0 Introduction**

Trans-Cycle Industries of Ohio, LLC (TCI) provides utilities and major industries with equipment decommissioning, dismantling, and recycling services for non-PCB (< 50 ppm PCBs) articles along with storage of PCB regulated material for storage only. Any regulated PCB items, as defined by 40 CFR §761.3, will be stored in Area I until shipment to EPA approved disposal facilities. It should be noted that TCI will receive both regulated and non-regulated articles (e.g., electrical equipment) and debris at the facility and many shipments will consist of both regulated and non-regulated material. Provided below are the procedures for receiving, analyzing, and storage of regulated PCB Articles, PCB fluids, and PCB debris. TCI will, at all times, operate the facility in accordance with all applicable local, state, and federal regulations.

## **2.0 General Procedures**

### **2.1 Personal Protective Equipment (PPE) for Receiving Material**

Plant staff may choose to implement a more restrictive PPE policy with the approval of the President and Health & Safety Manager. Engineered solutions to environmental conditions and experienced staff judgment shall be used for unique conditions and situations. No employee may personally choose his/her level of PPE to be worn. Determination of PPE requirements must be approved by the President and Health & Safety Manager. While accepting shipments regardless of the PCB level of the material being received, staff shall wear, at a minimum, the following PPE:

- safety glasses with side shields or goggles
- footwear protection
- protective gloves

- long-sleeved shirt and pants or the equivalent
- protective apron or Tyvek
- hard hats

## **2.2 Ergonomic Considerations**

Proper ergonomic techniques shall be used while handling materials; Proper techniques may include:

- Avoid bending and twisting while lifting materials from vehicles.
- Use mobile equipment to move materials from the vehicle to the conveyor area.
- Staff shall test materials, send samples to the lab. (turnaround time is approx. 24 hours)
- Precautions for the overall health and safety of staff shall be addressed, (e.g., training, PPE). Staff shall be trained within six months of hire or starting a new position or shall be supervised by trained and experienced staff.
- Staff shall endeavor to prevent spills and impacts to the environment during all site activities.

## **2.3 Unloading Vehicles**

TCI plant personnel unloading trucks/trailers shall do so in a manner that is generally safe for plant personnel to access and handle. The unloading of material should not expose personnel to unsafe hazards. If waste is delivered in a manner that is unsafe, the Shift Supervisor, in coordination with the President, will determine the following options:

- Unload or remove the materials so the load is safe to handle.
- Secure additional personnel and/or equipment to ensure the waste is safely accessible.
- Reject the material and inform the Generator.

## **2.4 Spill Kits and Spill Clean-up Procedures**

Spill kits will be stocked and readily available. Spill Kits will be inspected monthly to ensure they contain all needed items to respond to a regulated spill. After each and every spill incident, spill kits will be immediately re-stocked.

In the event of a spill, all personnel will follow the PCB Spill Clean-up Policy at 40 CFR 761 Subpart G. Employees will be trained in proper spill clean-up and containment procedures within 6 months of being hired and will be strictly supervised by Supervisory personnel prior to being trained and for 6 months following the training period.

## **2.5 Signage**

Signage in the facility pertains to the following:

- Smoking prohibited.
- Designated PCB Storage Areas
- Directing traffic flow into and out of Area I – PCB Storage Area.
- Exit locations.
- Emergency Evacuation Routes
- Spill Kits
- Fire Extinguishers
- Emergency Alarm locations.

### **3.0 Receiving Shipments**

#### **3.1 Accepted Waste Types**

TCI may receive multiple shipments on a daily basis and during multiple shifts.

The types of materials received at the facility will generally fall into the following categories as defined by 40 CFR 761.3:

- Non-PCB (< 50 ppm PCBs) articles (e.g., electrical equipment) drained and undrained
- Non-PCB fluids
- Non-PCB debris
- PCB-contaminated (50-499 ppm PCBs) articles, drained and undrained
- PCB-contaminated article containers
- PCB-contaminated fluids in drums
- PCB-contaminated debris
- PCB ( $\geq$  500 ppm PCBs) articles, drained and undrained
- PCB article containers
- PCB fluids in drums
- PCB debris
- Assumed PCB ( $\geq$  500 ppm PCBs) articles, drained and undrained
- Assumed PCB article containers
- Assumed PCB fluids in drums
- Assumed PCB debris

#### **3.2 Waste Types Not Accepted and their Exceptions**

TCI does not accept or process any items containing the following with the noted exceptions:

- Friable asbestos
  - Non-friable asbestos-containing materials contain asbestos fibers that are bound in tar-like or petroleum-based materials (such as roofing tar) and will be accepted for proper disposal.
- Explosives shall not be accepted.

- Radioactive material shall not be accepted.
  - Naturally occurring radioactive materials are sometimes found in electrical equipment. These items will be handled according to Generator's requirements.
- Hazardous wastes as defined by 40 CFR Subtitle C of the Resource Conservation & Recovery Act.

Each Generator will certify, prior to shipment, that the items being shipped do not meet any of the above excluded categories.

### **3.3 Unidentified Waste**

On occasion, TCI may receive shipments of unidentified waste. Prior to accepting any material into the facility, the type, quantity, and weight must be verified to determine that it meets one of the accepted waste types as shown in 3.1 above.

If the material meets the accepted waste types, then it may be accepted into the facility. If the material is determined to meet one of the non-accepted waste types as shown in 3.2 above, it will be rejected and returned to the Generator.

### **3.4 Waste Discrepancies**

Deficiencies and non-conforming wastes that are noted during the receiving process will be handled in the following manner.

- Discrepancies will be documented and a letter/email provided to the Generator.
- Discrepancies will be resolved by written documentation between TCI and the Generator until the discrepancy no longer exists.
  - The regulations require manifest discrepancies be resolved within 15 days of receipt. 40 CFR 761.215.
- In the case of discrepancies identified in the field or prior to receipt at the facility, Office Personnel will be notified in advance by telephone and, where possible, an email sent detailing the discrepancy.
  - Office Personnel will make a determination, after reviewing the Waste Profile and contacting the Generator if necessary), whether or not the waste material can ship or manifests/shipping documentation can be corrected.

### **3.5 Receiving Waste Materials into the Facility**

Once a determination is made verifying that the waste can be accepted into the facility, each item will be segregated as it comes off the truck/trailers into the following categories:

- non-regulated (< 50 ppm PCBs)
- regulated ( $\geq$  50 ppm PCBs) as verified by analysis or nameplate
- assumed PCB ( $\geq$  500 ppm PCBs).

All regulated PCB material, assumed or otherwise, will be immediately placed in Area I – PCB Storage Area. Non-regulated material will be placed into Area II

slots for draining and/or processing. At no time, will regulated PCB items be placed into Area II for storage or processing.

Each item received will be inspected for leaks. Any leaking items will be wiped down, if necessary, and either placed in a secondary containment (e.g. pan, drum, tote) or drained of all free-flowing liquids. Leaking non-regulated items will be moved to the pumping station and pumped into the bulk storage tanks. Once drained, they will be placed into secondary containment (in Area II) if still leaking or placed into an Area II slot for processing. Leaking, regulated items will be containerized, if possible, or drained using hand pumps into drums or totes. The leaking, regulated item and the drained fluid will be placed into Area I for storage. If necessary, the leaking, regulated item will be placed into a secondary containment within Area I awaiting shipment off-site for disposal. All identifying information and labels on the original regulated item will be placed on the new fluid container.

All regulated material will also be inspected for proper labeling and required identifying information. The information shown below is required for each regulated item:

- Hazardous Waste label
- Generator Name
- Generator Address
- Unique ID or Serial #
- Date removed from service (label or marking)
- Manifest #
- PCB M<sub>L</sub> Mark

Exception: Drained, PCB-contaminated (50 - <500 ppm PCBs) articles do not require a PCB M<sub>L</sub> Mark, Date Removed from Service or manifest.

Any items not properly labeled or not showing the required identifying information will be corrected at the time the item is placed into storage. Any missing identifying information should be available on the shipping documents (e.g., manifests). If the required identifying information is missing on the shipping documentation, the Generator will be immediately contacted to obtain the information.

### **3.6 Assumed PCB Material**

Material shipped into the facility as assumed PCB will be tested as soon as practical to determine the actual PCB level. (See Sampling Procedures SOP for details.) This material will be stored in Area I pending receipt of analysis.

Any items testing as PCB-contaminated (50 - < 500 ppm PCBs) will require the Generator be notified; analysis provided to the Generator; and the manifest corrected as directed by the Generator. These items will remain in Area I awaiting shipment off-site for disposal. Any label or identifying information that needs to be corrected will be done upon receipt of analysis.

Any items testing as PCB will remain in Area I awaiting shipment for off-site

disposal.

Any items testing as non-regulated (< 50 ppm PCBs) will require the Generator be notified; analysis provided to the Generator; the manifest corrected as directed by the Generator; the PCB labels removed or painted over, and the items will be moved to Area II for processing. Based on historical industry data, 90% of the items shipped a assumed test as non-regulated (< 50 ppm PCBs).

#### **4.0 PCB Inspections**

At least once every working day, a person designated by the President will do a walk-through of the PCB Storage Area. The following will be inspected:

- 1) No spills resulting in standing PCB fluid or absorbent on the floor or in containment pans.
- 2) No leaking items found in PCB storage area.
- 3) Concrete floor free of cracks and curbing intact.
- 4) No excessive wear of concrete floor joints.
- 5) No degradation of epoxy coating.
- 6) Roof intact preventing precipitation from entering the PCB Storage Area.

If any corrective action is taken, it will be noted on the PCB Monthly Inspection form with a detailed explanation of any issue and the date it was discovered with the resolution and date the issue was resolved. If no corrective action was taken, then the designated employee will note the date, write, "No issues found." and initial it.

At least once every 30 days, the President or a designated Manager/Supervisor will perform the same inspection verifying that no issues were found and no corrective action was necessary. If issues are found, then it will be noted on the PCB Monthly Inspection form with a detailed explanation of the issue, the date it was discovered, with the resolution and date the issue was resolved. If no corrective action was taken, then the President or designated Manager/Supervisor will note the date, write, "No issues found." and initial it.

The PCB Monthly Inspection form is attached as Exhibit A.

**US EPA ARCHIVE DOCUMENT**

**(to be completed at a minimum every 30 days)**

- 1) No spills resulting in standing PCB fluid or absorbent on the floor or in containment pans.
- 2) No leaking items found in PCB storage area.
- 3) Concrete floor free of cracks and curbing intact.
- 4) No excessive wear of concrete floor joints.
- 5) No degradation of epoxy coating.
- 6) Roof intact preventing precipitation from entering the PCB Storage Area.

Year: \_\_\_\_\_

7