

US EPA ARCHIVE DOCUMENT

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From: Graczyk, Lisa
Sent: Tuesday, December 08, 2015 3:34 PM
To: Zawodni, Dennis M
Cc: RITCHOTTE, GEORGE (GRITCHOT@idem.IN.gov)
Subject: Documents Required Prior to Demonstration Run Notice

Denny,

As requested.

The following documents and information must be submitted before or along with the thirty (30) day notification:

- a. A report for the 2012 Demonstration Run.
- b. Identification of current owner(s) in accordance with 761.65(d)(3)(i).
- c. Identification of the principals or key employees who are responsible for the operation of the facility. Include a brief description of the current organization for operating the facility and provide an organization chart identifying the key employees and their organizational responsibilities.
- d. Information concerning the principals' or key employees' technical qualifications and experience (including education and work experience) in handling PCB wastes or other wastes in compliance with regulatory requirements.
- e. A list of all companies owned or operated currently or in the past by the principals or key employees.
- f. Information concerning any past State, Federal, or local environmental violations involving the same business or another business with which the principals or key employees were affiliated for the past 5 years.
- g. A description of your current training program for process operators and technicians. Include the most recent copy of the PCB Processing Training Manual.
- h. A current cost estimate and any updates to your closure plan for the PCB storage and handling areas and the re-refining system.
- i. A copy of the current financial assurance for closure.
- j. A copy of the current Facility Inspection Plan, including the Vessel Inspection Procedure.
- k. A copy of the current Waste Oil Sampling Collection Procedure for PCB Analysis. This would include not only how used oil is accepted by the East Chicago facility, but how Safety-Kleen Systems, Inc. in general accepts used oil in North America.
- l. A copy of the current Sampling Plan for Monitoring Surface Contamination Outside of the PCB Management Areas.
- m. A copy of the current Safety-Kleen analytical methods 9202, 9203, and 9213.
- n. A copy of the current Spill Prevention, Control and Countermeasure Plan.
- o. A copy of the current Risk Management Plan.
- p. A copy of the current Safety Plan.
- q. Updated Process Flow Diagrams with correct sampling locations.
- r. A copy of the current Quality Assurance Manual.
- s. A copy of the current East Chicago Sanitary District Industrial Wastewater Pre-Treatment Permit.

Below is an outline for Demonstration Run Reports. This is from a guidance manual for permit writers for PCB disposal permits for alternate technologies.

- Report cover
- Table of contents
- Certification letter
- Summary
- Process Operation

- Sampling and Monitoring Procedures
- Analytical Procedures
- Test Results
- Quality Assurance Summary
- Visits and Audits
- Closure
- Waste Disposal Manifests
- Observations and Comments
- Appendices

Thanks.

Lisa

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