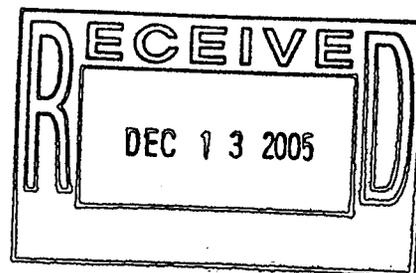


**POLYCHLORINATED BIPHENYL (PCB)
COMPLIANCE GUIDANCE**

October 2002



ADMIN RECORD

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Polychlorinated Biphenyl (PCB) Compliance Guidance

1.0 INTRODUCTION

The Polychlorinated Biphenyl (PCB) Compliance Guidance Plan (Plan) defines the regulatory and Rocky Flats Environmental Technology Site (RFETS or Site) requirements and responsibilities for managing PCB equipment and waste while protecting human health and the environment. This Plan outlines the requirements for the use, characterization, and management of PCBs in service and PCB waste regulated for disposal.

Note: Since this is a Site regulatory compliance and responsibilities document, individual disposal facility Waste Acceptance Criteria may differ from Site requirements and should be referenced prior to shipping Toxic Substances Control Act (TSCA) PCB waste off-site.

Under Section 6(e) of TSCA, Congress directed the U.S. Environmental Protection Agency (EPA) to promulgate rules for the management of PCBs. These rules codified in Title 40 of the Code of Federal Regulations (CFR), Part 761 (PCB Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions). The requirements differ for the various classifications or categories of PCB-containing materials and waste, which are generally classified as:

- Non-PCB Containing - less than 50 parts per million PCB
- PCB Contaminated - greater than or equal to 50 ppm, but less than 500 ppm
- PCB greater than or equal to 500 ppm
- PCB Remediation Waste
- PCB Bulk Product Waste

Most of the provisions in 40 CFR 761 apply to PCBs, with some exceptions only if they are present in concentrations above 50 ppm (e.g. storage and disposal requirements of Subpart D).

Regulatory Drivers and Responsibilities

This Plan is driven by the regulatory requirements of 40 C.F.R. Part 761, the Rocky Flats Cleanup Agreement (RFCA), other Site plans (e.g. RFCA Standard Operating Procedure [RSOP] for Concrete Recycling) and the receiving Site's Waste Acceptance Plan. Project Environmental Managers are responsible for the compliant characterization of PCB waste; the implementation of this guidance or alternative agreements with the Lead Regulatory Agency; and day-to-day regulatory compliance. The Kaiser-Hill Environmental Stewardship and Systems (ESS) group is responsible for providing oversight for the Site PCB Program; preparation of regulatory reports, and integration with other programs at the Site.

2.0 PCB CATEGORIES AND AUTHORIZED USES

2.1. PCB CATEGORIES

EPA has categorized PCBs by defining the management requirements. The following categories include the typical types of in-use PCBs and PCB wastes found at the Site. Reference Section 10 - Terms and Definitions, of this Plan for definitions of these categories.

- Liquid PCBs – material containing PCBs in or as free liquids by visual inspection or by using a paint filter test (e.g. PCB mineral oil removed from electrical equipment).
- Nonliquid PCBs – PCB material containing no free liquids (e.g. drained PCB carcass).

- PCB Articles – any manufactured article, other than a PCB Container, that contains PCBs and whose surface has been in direct contact with PCBs.
- PCB Items – any PCB Article, PCB Article Containers, PCB Containers, and PCB Equipment or anything that deliberately or unintentionally contains PCBs (e.g. 55-gallon drum containing PCB waste).
- PCB Equipment – Any manufactured item, other than a PCB container or a PCB Article container, that contains a PCB Article or other PCB Equipment, and includes microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.
- PCB Contaminated Electric Equipment – equipment that contains PCBs at concentrations ≥ 50 ppm but < 500 ppm or surfaces at PCB concentrations of $> 10/100 \text{ cm}^2$ to $< 100 \mu\text{g}/100 \text{ cm}^2$ (e.g. Transformer)
- PCB Remediation Waste – waste containing PCBs as the result of a spill, release or other unauthorized disposal (e.g. absorbent material used in the cleanup of a PCB oil spill).
- PCB Bulk Product Waste (including paint-related material) – waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration where the concentration at the time of designation for disposal is ≥ 50 ppm (e.g. equipment painted with paint containing PCBs ≥ 50 ppm). (**Note:** Refer to 40 CFR 761.3 for a listing of material/waste included in this definition.)
- PCB/Radioactive Waste – radioactive waste containing TSCA regulated PCB material (e.g. Low-level (LL) or Transuranic (TRU) waste that is contaminated with oils containing ≥ 50 ppm PCB oil).

2.2. AUTHORIZED USES AND USE CONDITIONS FOR PCBs STILL IN SERVICE

TSCA regulations contained in 40 CFR, Part 761 regulate the authorized uses and the management of PCBs remaining in service. The Project Environmental Manager should be contacted for specific management and disposition requirements.

2.2.1. Authorized Uses

The manufacture, processing, and distribution in commerce and use of PCBs in other than a "totally enclosed" manner or in an authorized "non-totally enclosed" manner was prohibited under the 1979 PCB regulations and subsequent amendments. Authorized PCB uses and use restrictions, specified in §761.30, classify intact, non-leaking electrical equipment such as transformers, capacitors, electromagnets, voltage regulators, switches, circuit breakers, reclosers, and cable as "totally enclosed" thus excluding this equipment from the use ban.

PCB containing equipment manufactured prior to 1979 may remain in service as long as the equipment is operational. However, Kaiser-Hill cannot sell or transfer equipment-containing PCBs that were manufactured prior to 1979 (e.g. equipment containing PCB contaminated mineral oil)

2.2.2. Non-liquid PCB Material

There are certain uses of non-liquid PCBs occurring at RFETS. These uses may include: gaskets, plastics, plasticizers, fluorescent light ballast potting material, electrical cable, dried paints, small rubber parts, roofing and siding materials, insulation, caulking, waterproofing compounds, ceiling tile coatings, and adhesive tape. These non-liquid PCBs must be managed as PCB Bulk Product Waste when removed from service for disposal. Refer to the Project specific Waste Generator Instruction (WGI) or the Project Environmental Manager for requirements concerning disposition.

2.2.3. The Assumption Policy for Mineral Oil-Filled Electrical Equipment

Mineral oil-filled electrical equipment, including transformers, manufactured after July 2, 1979, and whose PCB concentration is not established may be assumed to be non-PCB. However, the actual PCB

concentration of the equipment must be determined prior to disposal.

Conditions for Use of PCBs Still in Service

The following conditions apply to managing equipment still in use at the Site that contain PCBs at regulated levels.

- **Transformers.** PCB Transformers are transformers containing PCBs at a concentration ≥ 500 ppm. There are no known remaining PCB transformers on Site. If a PCB transformer is identified, the Project Environmental Manager should be contacted immediately. PCB Contaminated Transformers (PCB Contaminated Electric Equipment) are those with a PCB concentration ≥ 50 ppm and < 500 ppm or surfaces at PCB concentrations of $> 10/100 \text{ cm}^2$ to $< 100 \mu\text{g}/100 \text{ cm}^2$.
- **Capacitors.** Two potential types of PCB capacitors remain on-site - large and small capacitors. **Small capacitors** are those that contain less than 1.36 kilograms (3 pounds) of dielectric fluid. **Large High or Low Voltage capacitors** are those with greater than 1.36 kilograms of dielectric fluid and operate at specific voltage levels.
- **Circuit Breakers, Reclosers, Cables, and Rectifiers.** Circuit breakers, reclosers, cables, and rectifiers containing PCBs ≥ 50 ppm PCBs may remain in use. If maintenance is required, any removed oils must be replaced with oils containing less than 50 ppm PCBs.
- **Fluorescent Light Ballasts.** Intact, non-leaking PCB ballasts currently in use may continue to be used. Once designated as waste, these ballasts must be managed as PCB Bulk Product waste.

When removing PCB fluorescent lights from service, the light ballasts should be characterized as either PCB or non-PCB. Fluorescent light ballasts manufactured between July 1, 1978 and July 1, 1998 were required to be marked by the manufacturer as "No PCBs" Ballasts manufactured prior to July 1, 1998 that do not exhibit a "No PCBs" mark will be assumed to contain ≥ 50 ppm PCBs and be managed as PCB Bulk Product Waste.

Leaks or spills that result in any quantity of PCBs leaving the ballasts require cleanup in accordance with Section 6.0 of this Plan. Leaking ballasts are managed as PCB Bulk Product Waste; however the PCB Bulk Product Waste containing leaking ballasts must be managed for disposal by TSCA PCB incinerator, a TSCA PCB landfill, a RCRA landfill, an alternate TSCA PCB disposal method, a decontamination procedure, PCB coordinated approval, or a risk based approval. The materials resulting from the cleanup of leaking ballasts are managed as PCB Bulk Remediation Waste.

To facilitate proper disposal, light ballasts should be segregated based on PCB content. Ballasts containing PCBs in the potting material should be managed as PCB Bulk Product Waste for storage and disposal purposes. The remaining ballasts can be managed as non-TSCA PCB regulated.

- **Heat Transfer and Hydraulic Systems.** Heat transfer systems and hydraulic systems containing PCBs may be in use or found at the RFETS. These systems are only authorized for use with a concentration level of less than 50 ppm PCBs. If maintenance for those in service is required, any removed oils must be replaced with oils containing less than 50 ppm PCBs.
- **Electromagnets, Switches, and Voltage Regulators.** Electromagnets, switches, and voltage regulators (including sectionalizers and motor starters) containing PCBs at any concentration may remain in use. If this equipment is in use, contact the Project Environmental Manager for specific requirements.
- **Use of PCBs in Air Compressor Systems.** At this time, there are no identified compressor systems that contain ≥ 50 ppm PCBs. Should one be identified, contact the Project Environmental Manager.

3.0 PCB MARKING AND MANAGEMENT REQUIREMENTS

It is required that all PCB containers, equipment, and storage areas be specifically labeled with a PCB Mark (PCB Large Mark or ML). For those containers and equipment too small to accommodate the Large PCB Mark, the PCB Small Mark (MS) may be used. At Rocky Flats, this requirement is met by placing the yellow PCB waste label on our containers. In addition to the Mark, the out-of-service date, and gross weight - specified in kilograms - must be placed on the container (conversion: 1 pound = 0.454 kilograms). Refer to Appendix 1 for copy of the different PCB Marks.

All updates to container information must be accurately maintained in the Waste Environmental Management System (WEMS). In addition, for PCB waste the following fields in WEMS must be completed: 1) the gross weight provided in kilograms; 2) 'PCB field' marked *yes*; and 3) the 'out-of-service date' identified for the waste.

PCB waste containers must be in good physical condition and suitable for the types of waste being stored in them. Unacceptable containers are those that are severely rusted or have apparent significant structural defects such as indented chimes, dents, etc. In addition, the containers must be made of materials compatible with the PCB wastes being stored in them.

PCB waste containers must be closed at all times except when adding or removing waste from the container.

The following table summarizes the different labeling (marking) requirements for the different types of PCB equipment and wastes that may be in service or generated at RFETS. (Contact the Project Environmental Manager for Project specific requirements.)

Table 1 - Summary of PCB Storage Marking Requirements

PCB STORAGE MARKING REQUIREMENTS	
Regulated Item (See Section 10 for definitions)	Marking (Labeling) Requirement
PCB Bulk Remediation Waste	Large PCB Mark on Container and on Storage Area
PCB Bulk Product Waste	Not Required when sent to a Subtitle D facility. Required if sent to a Subtitle C or TSCA landfill.
Large high- and low-voltage capacitors	Large PCB mark on Unit or on protected location
Natural gas pipelines, compressors, appurtenances, air compressor systems (≥ 2 ppm)	Large PCB Mark on aboveground items with PCB liquids ≥ 50 ppm
PCB Article Containers	Large PCB Mark on item
PCB Containers	Large PCB Mark on Container
PCB-Contaminated Electrical Equipment	Not Required
PCB Equipment	Large PCB Mark on Item
PCB Transformers	Large PCB Mark on item and access to unit (i.e., door, etc.)
Small capacitors	Not required on each capacitor
Storage Areas	Large PCB Mark on Area
Transport Vehicles	Large PCB Mark on vehicle if it contains: 1) one or more PCB Transformers; or 2) 45 kilograms of liquids or more (gross weight)

4.0 PACKAGING REQUIREMENTS

PCB wastes should be packaged in accordance with the requirements outlined in the following Site Procedures:

- 4-D99-WO-1100, Solid Radioactive Waste Packaging
- 1-C88-WP1027-NONRAD, Nonradioactive Waste Packaging
- 1-M12-WO-4034, Solid Radioactive Waste Packaging Requirements
- 1-C80-WO1102-WRT, Waste/Residue Traveler Instructions
- 1-T93-Traffic-110, Rocky Flats Transportation Safety Manual
- 1-PRO-079-WGI-00I, Waste Characterization, Generation and Packaging
- 1-PRO-079-WGI-001, Waste Generation Instructions (WGI)

5.0 PCB STORAGE FOR DISPOSAL

5.1. WASTE STORAGE

PCB wastes must be stored in designated locations that are included in WEMS and have a WEMS barcode location number (Building Unit Room – BUR code). At a minimum, the storage area must either be RCRA-permitted or designated to store waste PCBs (meet the TSCA storage area specifications under 40 CFR 761.65(b)). Solid PCBs may be stored in a RCRA permitted unit without secondary containment provided that the storage area is sloped to remove any potential liquids (e.g. precipitation run-on) or the containers are elevated to protect contact from such liquids. The storage unit must be marked with a PCB label. Contact your Supervisor or Project Environmental Managers for specific areas. (Specific PCB storage requirements can be found in 40 CFR 761.65)

PCBs and PCB-contaminated wastes must be stored in tightly closed, Department of Transportation (DOT) approved containers. An exception to this allows Bulk PCB Remediation Waste or PCB Bulk Product Waste to be stored at the clean up site or site of generation for up to 180 days in a waste pile with the Project Environmental Manager's approval. Specific requirements must be met (see 40 CFR 761.65(c)(9)).

For historical containers that are not currently DOT approved, the material can remain stored in Site approved containers meeting the DOE guidance standards. However, when shipping this material off-site the container must be DOT approved. (*DOE Guidance EH-413-0006/0702, "PCB Storage Requirements"*)

PCBs may be stored on-site for up to 9-months from the out-of-service date or the date the waste was determined to contain PCBs. Regulations require that PCB waste be disposed within 1-year from these dates. PCB wastes that are also radioactively contaminated are exempt from the 1-year requirement. For CERCLA waste, the 1-year TSCA requirement is an administrative Applicable or Relevant and Appropriate Requirement (ARAR).

PCB "Storage for Disposal Area" Custodians must coordinate with the Kaiser-Hill Shipping and Disposal Group to ship stored PCBs to a Kaiser-Hill approved disposal facility within 9-months of the 'Removal from Service for Disposal Date' unless the waste contains PCBs and is radioactive. In such case, the 9-month limitation does not apply provided a written record to secure disposal is maintained and available for inspection. This 9-month timeframe is to ensure that the non-radioactive PCB waste is destroyed within the 1-year regulatory timeframe.

Non-leaking PCB equipment or containers containing non-liquid PCB waste may be stored temporarily outside of approved storage areas with prior approval from the Project Environmental Manager. Storage may be no longer than 30-days from the date of removal from service. The out-of-service (accumulation start) date must be noted on the PCB Item.

5.2. WASTE INSPECTIONS

Qualified and trained personnel perform PCB Inspections. All PCB Items (equipment, containers and tanks) in storage shall be inspected for leaks at least once every 30-days. (Note: this is different from "monthly".) Leaking PCB Items and/or their contents shall be transferred immediately to properly marked non-leaking containers and any spilled or leaked materials shall be immediately cleaned up and the materials and residues containing PCBs shall be properly managed. Notify your Supervisor or Project Environmental Manager of any spills immediately. Cleanup of spills must be done in accordance with Section 7.0 of this guidance.

Leaking or significantly damaged non-leaking PCB containers must also be transferred to a DOT-specification "overpack" container or the waste material must be repacked. Because the overpack container may be used ultimately as the off-site shipping container, consult the Traffic Department and Waste Requirements Representative for guidance on the container specification prior to packaging.

Instructions for PCB inspections are explained on the unit-specific waste inspection form. A sample of a *PCB Storage for Disposal Area Inspection Checklist* is provided in Appendix 2. Unit inspection checklists, such as RCRA weekly inspections, may be used in lieu of separate PCB inspection checklist provided the inspections occur within a 30-day period. Project-specific waste inspection requirements can be obtained from the Environmental Manager.

Any identified deficiency must be noted on the inspection form and entered into the Environmental Compliance Action Tracking System (ECATS). As a general rule, the Project Environmental Manager should be notified of any deficiency that cannot be immediately corrected. TSCA PCB waste inspection forms are signed at the time of inspection by the person performing the inspection, and maintained on file in a secure area.

Contact the Project Environmental Manager for Project specific requirements.

5.3. SPECIAL REQUIREMENTS FOR BULK PCB REMEDIATION WASTE AND PCB BULK PRODUCT WASTE

Outdoor storage of bulk PCB Remediation Waste and PCB Bulk Product Waste is allowable under TSCA, but prohibited at the RFETS without prior approval from the Project Environmental Manager who will define the regulatory compliance requirements.

6.0 PCB CHARACTERIZATION AND DISPOSAL

This section summarizes general PCB characterization and disposal requirements, and provides the specific disposal requirements for each PCB waste category. These requirements are applicable for the disposal of Liquid PCBs, PCB Items, and other PCB wastes.

For waste management purposes, TSCA wastes at Rocky Flats are divided into 7 primary categories

- (1) **PCB Contaminated Waste** – Wastes containing PCBs at concentrations between 50 ppm and 500 ppm.
- (2) **PCB Container** – Any package, can, bottle, bag, barrel, drum, tank or other device that contains PCB waste or equipment and whose surface has been in direct contact with PCBs.
- (3) **PCB waste(s)** – Those PCBs and PCB Items subject to the storage and disposal requirements of §761.50 through §761.79 - Subpart D, Storage and Disposal, which applies to PCB liquids, PCB Items, PCB Remediation Waste; PCB Bulk Product Waste, PCB/radioactive waste; PCB household waste, PCB research and development waste; and porous surfaces.

- (4) **PCB Contaminated and PCB Contaminated Electrical Equipment** – materials or electrical equipment containing ≥ 50 ppm but < 500 ppm PCBs. PCB Contaminated Electrical Equipment includes transformers, capacitors (including those in electronic equipment), circuit breakers, electrical switches, voltage regulators and cable.
- (5) **PCB Bulk Product Waste** – Waste derived from manufactured products containing PCBs in the non-liquid state with concentrations at the time of designation for disposal ≥ 50 ppm. At Rocky Flats, this includes:
 - painted surfaces contaminated with PCB paint
 - paints containing PCBs greater than 50 ppm
 - light ballasts
- (6) **PCB Remediation Waste** – waste containing PCBs as the result of a spill, release or other unauthorized disposal. Contact your Project Environmental Manager for specific concentration limits.
- (7) **PCB/Radioactive Waste** – Low level or Transuranic waste contaminated with PCBs ≥ 50 ppm or otherwise characterized as TSCA regulated PCB waste.

Note: If a transformer, capacitor or other PCB suspect equipment does not have a PCB label (Mark) on them, it will be managed as TSCA PCB regulated until additional information is obtained to show otherwise.

6.1. GENERAL DISPOSAL REQUIREMENTS

General PCB disposal requirements include:

- Off-site treatment and disposal of PCBs is governed by Site Procedure I-MAN-037-OWMP, Off-site Waste Management Program.
- Site policy is that liquid PCBs ≥ 50 ppm are not to be solidified into non-liquid form in order to avoid incineration requirements.
- Land disposing of non-liquid PCBs in a chemical landfill may be used to avoid otherwise-applicable sampling requirements by presuming that the concentration of PCBs to be disposed of are > 500 ppm - or $> 100 \mu\text{g}/100 \text{ cm}^2$ if no free-flowing liquids are present.
- Any person who removes a PCB Item containing an intact and non-leaking PCB Article (see Section 10 for definition) from use must dispose of the item as a PCB Article. Contact the Project Environmental Manager for regulatory requirements for PCB decontamination requirements if the equipment is to be decontaminated.
- Intact fluorescent light ballasts, which contain PCBs in the potting material, should be disposed as PCB Bulk Product Waste. (See Section 6.2.5 of this Plan).
- Resource Conservation and Recovery Act (RCRA) Characteristic Wastes (excluding soils) that contain PCBs ≥ 10 ppm as an Underlying Hazardous Constituent must be treated to meet Land Disposal Restriction (LDR) requirements prior to disposal. (e.g. If paint is removed from walls, it may contain lead as well as PCBs). RCRA regulated contaminated soils may be treated to meet LDR under the alternate LDR treatment standards at 40 CFR 2698.49. Note PCBs in soils treated by the alternative land disposal restriction treatment standards for soils are not constituents subject to treatment in contaminated soils which exhibit toxicity characteristics solely because the presence of metals.

6.2. PCB WASTE DISPOSAL-CATEGORY SPECIFIC REQUIREMENTS

Wastes that are approved for disposal in either a municipal solid waste landfill or in a TSCA- approved chemical waste landfill may also be incinerated at a Kaiser-Hill approved facility consistent with requirements outlined in the Facility Use Decision (FUD).

6.2.1. Non-TSCA Regulated wastes

Non-TSCA PCB regulated material (e.g. solid waste containing <50 ppm PCBs) may be landfilled at a Kaiser-Hill approved municipal or hazardous waste landfill. There are no specific packaging or labeling requirements for this waste category.

6.2.2. Liquid PCBs

- PCB liquids with concentrations ≥ 50 ppm must be managed at a Kaiser-Hill facility designated to manage PCBs. (e.g. TSCA Permitted Incinerator)
- PCB liquids with original concentrations <50 ppm are not regulated and should be managed as any other sanitary liquid.

6.2.3. PCB Items (Including PCB Equipment and Containers)

The following guidelines should be used when disposing of PCB Items:

- **Concentration Determination.** The PCB concentration of the oil-filled electrical equipment must be determined prior to disposal. The TSCA regulations do not explicitly require analytical testing to determine the PCB concentration for disposal. Under certain circumstances, it may be appropriate not to test the PCB equipment or fluids, but to apply generator knowledge of the PCB concentration based on factors such as permanent nameplates, marks, or other documentation from the manufacturer of the equipment indicating the PCB concentration. Contact the Project Environmental Manager if this approach is to be used.
- **PCB Transformers (intact with oil containing PCBs at ≥ 500 ppm).** PCB Transformers (intact with oil containing PCBs at ≥ 500 ppm) must be disposed of at a Kaiser-Hill approved facility. (e.g. TSCA Permitted Incinerator)
- **PCB-Contaminated Electrical Equipment Carcasses (originally/once containing liquid PCBs at concentrations of ≥ 50 ppm but less than 500 ppm -- except capacitors).** PCB-Contaminated Electrical Equipment Carcasses, where the PCBs have been removed may be disposed in municipal solid waste landfill. The removed fluids must be disposed of in accordance with the requirements for Liquid PCBs.
- **Large High- and Large Low-Voltage Capacitors (LHVC and LLVC) containing PCBs at concentrations ≥ 50 but less than 500 ppm.** These wastes may be disposed of at a Kaiser-Hill approved TSCA Permitted Incinerator designated to manage PCBs or by chemical waste landfilling if authorized to receive such waste.
- **Non-Leaking PCB Small Capacitors.** Any quantity of intact and non-leaking small capacitors may be disposed of as municipal solid waste. Leaking capacitors must be sent off-site for management.
- **Hydraulic Machines Contaminated with PCB Oil.** If the concentration of PCBs in the oil of hydraulic equipment is ≥ 50 ppm, but <1000 ppm, the free-flowing liquid must be removed and the machine may be disposed of as municipal solid waste provided it is drained of all free-flowing oil. If the oil is ≥ 1000 ppm, the machine must be (as defined in §761.79 and §761.60(b)1.i.B and §761.79) flushed with solvents meeting specific criteria before disposal as municipal solid waste. Removed oils and solvents must be managed in accordance with PCB concentration levels determined from sampling at time of their disposal.
- **PCB Containers.** PCB Containers with concentrations ≥ 500 ppm PCBs must be disposed of by incineration; in a chemical waste landfill provided free-flowing liquids have been removed; or by decontamination. Containers used to contain PCBs at concentration < 500 ppm may be disposed as municipal solid waste provided that all free-flowing liquids have been removed. Liquids must be

managed according to PCB concentrations. However, to protect Company liability, all TSCA regulated containers with ≥ 50 ppm are managed at a chemical waste landfill.

- **Other PCB Items That Do Not Contact PCBs.** The disposal of PCB Items that do not contact PCBs is not regulated. For example, the external housing of a fluorescent light fixture containing a PCB capacitor or ballast with PCB in the potting material is not regulated.
- **Other PCB Articles (including pumps, pipes, and other manufactured items with liquid PCBs).** PCB Articles with ≥ 500 ppm PCBs must be disposed of by incineration; in a chemical waste landfill provided free-flowing liquids have been removed; or by decontamination. Articles with PCBs at concentrations between 50 ppm and 499 ppm may be disposed as municipal solid waste provided that all free-flowing liquids have been removed. Removed liquids must be managed in accordance with PCB concentration.
- **PCB Radioactive Waste** - LL and TRU wastes contaminated with ≥ 50 ppm are referred to as LL TSCA (LLT) or TRU TSCA (TRT) waste. Both LLT and TRT wastes must be managed in accordance with both the applicable waste management and TSCA requirements outlined above. For example, a TRU-level radioactive contaminated light ballast containing PCBs, would have to be managed according to both TSCA and TRU waste requirements.

Note: Under the TSCA PCB regulations, PCB radioactive wastes may be disposed at a non-TSCA facility. In the example above, the TRU PCB light ballast could be disposed as PCB Bulk Product waste in a facility that was permitted to manage the radioactive waste; TSCA authorization for disposal would not be needed for the disposal facility.

6.2.4. PCB Remediation Waste

A. Remediation Waste - General Information

PCB remediation waste is defined as waste containing PCBs generated as a result of a spill, release, or other unauthorized disposal, at the following concentrations:

- Materials disposed of prior to April 18, 1978, that are currently at concentrations ≥ 50 ppm PCBs, regardless of the concentration of the original spill;
 - Materials which are currently at any volume or concentration where the original source was ≥ 500 ppm PCB beginning on April 18, 1978, or ≥ 50 ppm PCB beginning on July 2, 1979; and
 - Materials which are currently at any concentration if the PCBs are from a source not authorized for use under 40 C.F.R. 761.
- **PCB Bulk Remediation waste includes** soil, rags, and any other debris generated as a result of any PCB spill cleanup, as identified in §761.3 and as directed by the Project Environmental Manager.
 - **PCB Bulk Remediation waste also includes**, but is not limited to, soil, sediments, dredged materials, mud, PCB sewage sludge, and industrial sludge.
 - Under TSCA PCB regulations, any person cleaning up and disposing of PCB Remediation Waste shall do so based on the concentration at which the PCBs are found.
 - Bulk PCB solid Remediation waste with a PCB concentration of < 50 ppm may be landfilled as municipal solid waste provided that there are no free flowing liquids.
 - PCB Bulk Remediation waste with a PCB concentration of ≥ 50 ppm shall be disposed of in a permitted hazardous waste landfill or a permitted TSCA landfill.
 - For Facility Disposition or other CERCLA activities, the Project Environmental Manager will identify management requirements for PCB Remediation Wastes using the RFCA Decision Document method.

Using this method, the Project will review the requirements of this Plan and the PCB regulations to determine the substantive requirements that apply.

B. PCB Remediation Waste - Cleanup and Disposal Options

EPA has established three cleanup and disposal options for PCB Remediation Wastes that may be considered substantive requirements under CERCLA. (**Note:** Contact your Project Environmental Manager for questions regarding PCB remediation waste.)

- (1) **Self-Implementing On-Site Cleanup and Disposal Option.** This option is intended for cleanups at small to moderate-size sites with PCBs as the primary contaminant of concern. The Self-Implementing Option stipulates specific characterization, cleanup and verification standards. Implementing the cleanup according to these standards usually precludes the need for formal EPA approval and oversight.
- (2) **Performance-Based Option.** This option dictates that specific PCB Remediation Waste types be disposed using TSCA-approved disposal technologies or pre-defined decontamination procedures. Disposal of PCBs using these approved technologies precludes the need for formal EPA approval and oversight.
- (3) **Risk-Based Option.** This option allows for the submittal of an application for cleanup using methods that vary from the Self-Implementing or Performance-Based options. The application is to be submitted to and approved by EPA prior to implementing the disposal activities.

6.2.5. PCB Bulk Product Waste

A. Bulk Product Waste - General Information

The PCB management issue with the greatest potential impact on the RFETS Closure Project is the characterization and disposal of suspect PCBs in the demolition debris, paints, and coated surfaces of excess property and equipment. These wastes are categorized as PCB Bulk Product Wastes.

Bulk Product Waste is defined as waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration where the concentration at the time of designation for disposal was ≥ 50 ppm PCBs. (Refer to §761.3 for a more detailed listing of Bulk Product Waste.) Contact your Project Environmental Manager for questions regarding the characterization and management of PCB Bulk Product Waste. PCB Bulk Product Waste excludes PCBs or PCB Items, but includes:

- Non-liquid bulk wastes or debris from the demolition of buildings and other man-made structures manufactured, coated, or serviced with PCBs;
- (**Note:** PCB Bulk Product Waste does not include debris that is contaminated by spills from regulated PCBs not otherwise disposed of, decontaminated or cleaned up. Such debris is regulated as PCB Remediation Waste.)
- PCB-containing wastes from the shredding of automobiles, household appliances, or industrial appliances;
- Plastics, preformed or molded rubber parts and components, applied dried paints, varnishes, waxes, or other similar coatings or sealants; caulking; adhesives; paper, Galbestos; sound-deadening or other types of insulation; and felt or fabric products such as gaskets; and
- Non-leaking fluorescent light ballasts containing PCBs in the potting material.

B. PCB Bulk Product Waste - Cleanup and Disposal Options

The following is a summary of the disposal options for the different types of Bulk Product Waste

Disposal of Non-radioactive PCB Bulk Product Waste. The RFETS disposal option for Non-radioactive PCB Bulk Product Waste is the solid waste landfilling option. Specifically, PCB Bulk Product Waste can be disposed of at a municipal solid waste landfill. For most PCB Bulk Product Wastes, implementing this strategy precludes the need for PCB characterization prior to or during disposition.

PCB Bulk Product Waste/Dried Paint is disposed of based on its PCB concentration under §761.62(a), on its leaching characteristics under §761.62(b), or in accordance with risk based approval under §761.62(c).

PCB Bulk Product Waste also includes applied paint containing PCBs. This includes paint, whether or not the paint has been removed from the surface to which it was applied. Non-radioactive paint containing PCBs at concentrations ≥ 50 ppm is regulated for disposal and may be disposed of at a Kaiser-Hill approved municipal landfill.

Notification to the disposal facility is required at least 15-days in advance of shipping the first shipment of each waste stream to the receiving facility. Such notification is coordinated with Material Stewardship personnel.

Disposal of Radioactive PCB Bulk Product Waste. Radioactive PCB Bulk Product Waste must be characterized using the above criteria and must be managed at a Kaiser-Hill approved facility. (e.g. Nevada Test Site or Envirocare)

Alternatives to the Default Disposal Strategy for Excess Property Containing PCB Bulk Product Waste. The solid waste landfilling option may not be appropriate for the re-utilization, transfer or disposal of Government personal property that has been declared excess to the needs of the RFETS and that also contains PCB Bulk Product Waste. Examples of such property include salvageable equipment that is painted with PCB-containing paint; or wire or cable with plastic insulation.

Requirements in the "Property Management Manual" (1-MAN-009-PMM, PADC-1997-01338) must be followed to identify property for disposition. If, based on this manual, it is necessary to decontaminate the PCBs to disposition the property, the property must be decontaminated in accordance with requirements of Section 6.3 of this Plan.

6.2.6. Porous Surfaces (e.g. concrete)

TSCA defines porous surfaces as any surface that allows PCBs to penetrate or pass into itself. Examples include paint or coating on metal, porous building stone, concrete or cement, plasterboard or wallboard, rubber, fiberboard, low-density plastics, etc. The following are guidelines when managing these types of wastes.

Porous surfaces on which PCBs have spilled and which meet the definition of **PCB Bulk Remediation Waste** (see Section 6.2.4) must be disposed of in a permitted hazardous waste landfill or a PCB disposal facility approved under the TSCA regulations.

Porous surfaces that are part of manufactured, non-liquid products containing PCBs, such as applied dried paints must be disposed of in accordance with the requirements for **PCB Bulk Product Waste** (see Section 6.2.5).

Decontamination of PCB-contaminated concrete must commence **within 72 hours of the initial spill**. Otherwise, dispose of the concrete as PCB Remediation Waste. Contact the Project Environmental Manager for specific requirements.

Non-porous surfaces containing porous non-liquid PCBs, e.g., painted or coated metal, for purposes of unrestricted use or disposal must be dispositioned in accordance with the requirements in §761.79. (Decontamination Standards and Procedures)

6.2.7. Presumptive Rule for Managing Paint-Related Wastes

A number of building surfaces being wasted at Rocky Flats historically were painted with paints containing PCBs. To ensure that this waste is being properly managed and disposed of, characterization must be done using generator knowledge or sampling data. Based on information provided by EPA and a study conducted at Savannah River Project (SRP), there is evidence that demonstrates that "age" is a factor in determining PCB-based paint usage. The manufacture of PCB based paints was discontinued in the early 1970s. Based on that information and the limited shelf life of paints, especially mil-spec-paints, a date of 1980 was chosen for RFETS waste as the "age" discriminator. Hence, if a building was constructed before 1980, the paint used on the building surfaces will be presumed to contain PCBs above regulatory levels, (that is ≥ 50 ppm). Prior to packaging the waste, it must be properly characterized and dispositioned appropriately. The material may be sent off-site as PCB Bulk Product Waste and in other cases, may be used as backfill under the Concrete RSOP or used as in-situ backfill. (See Section 6.2.8)

The Project Environmental Manager should be consulted regarding the management of PCB contaminated painted surfaces.

6.2.8. In-Situ Backfill of PCB-Based Painted Concrete

Based on a risk-based analysis consistent with §761.62(c), Kaiser-Hill received authorization from EPA Region VIII to allow PCB-based painted concrete to be used as backfill on-site. The approval is conditional upon using a dust control process during demolition to prevent potential contamination of PCBs to surrounding areas. In addition, groundwater monitoring may be required. Contact the Project Environmental Manager for project specific requirements.

6.3. DECONTAMINATION FOR DISPOSAL

Requirements in this section are applicable to **PCB Equipment** that has been drained and will be sent off-site for disposal, reuse or recycle. Decontamination for disposal will primarily be used for mixed PCB waste.

6.3.1. Applicability

Decontamination Standards and procedures apply to the removal of regulated PCBs from water, organic liquids, non-porous surfaces (including scrap metal from disassembled electrical equipment), concrete, and non-porous surfaces covered with a porous surface, such as paint or coating on metal.

Benefits derived from decontamination of these materials include:

- Decontamination in accordance with these standards does not require disposal approval by EPA.
- Materials that have been decontaminated may be re-distributed in commerce, may be used or reused, and are unregulated for disposal.

If the PCB waste is also a RCRA hazardous waste, a Colorado Hazardous Waste Act (CHWA) treatment permit, or coverage in a "RFCA Decision Document" may be required prior to performing decontamination activities.

6.3.2. Measurement-Based Decontamination Standards

The following processes are approved for the decontamination of PCBs from liquids, concrete, or non-porous surfaces. The Project Environmental Manager should be contacted for specific requirements prior to announcement of decontamination activities.

- Distilling
- Oil/water separation
- Soaking
- Stripping of insulation
- Scarification
- Filtering
- Spraying
- Wiping
- Scraping
- Use of abrasives, use of solvent

The Measurement-Based Decontamination Standards for the applicable materials are summarized in the table below.

Table 2 - Measurement-Based Decontamination Standards Under §761.79

Decontaminated Item	Standard For Non-Contact Use In A Closed System	Standard For Discharge To Treatment Works Or Navigable Waters	Standard For Unrestricted Use	Standard For Disposal In Smelter Operation [§761.72(B)]
Water	<200 µg/L	<3 µg/L ^(a) < 2 ug/L (state) ^(b) < 14 ng/L (state) ^(c) < 5 ng/L (state) ^(d) <44E ⁻⁶ ug/L (state) ^(e)	≤0.5 µg/L ^(a) < 44E ⁻⁶ ug/L ^(e)	No Standard
Organic Liquid, or Non-Aqueous Inorganic Liquid	No Standard	No Standard	<2 mg/kg	No Standard
Non-Porous Surfaces Previously in Contact with Liquid PCBs	No Standard	No Standard	≤10 µg/100cm ² ^(f)	≤100 µg/100cm ² ^(f)
Non-Porous Surfaces Previously in Contact with Non-Liquid PCBs	No Standard	No Standard	Visual Standard No.2, Near-White Blast Cleaned Surface Finish ^(g)	Visual Standard No.3, Commercial Blast Cleaned Surface Finish ^(g)
Concrete	No Standard	No Standard	≤10 µg/100cm ² ^(h)	No Standard

(a) Federal TSCA standard at 40 C.F.R. §761.79
 (b) State of Colorado acute standard for the protection of aquatic life only (5CCR 1002-31)
 (c) State of Colorado chronic standard for the protection of aquatic life only (5CCR 1002-31)
 (d) State of Colorado standard for the protection of water supply (5CCR 1002-31)
 (e) State of Colorado standard for the protection of water plus fish (5CCR 1002-31)
 (f) As measured by wipe tests at locations determined in accordance with 40 C.F.R. 761
 (g) Standards of the National Association of Corrosion Engineers (NACE)
 (h) As measured by a Standard Wipe Test under §761.123 if the decontamination procedure is commenced within 72 hours of the initial spill of PCBs to concrete.

6.3.3. Self-Implementing Decontamination Procedures

Self-implementing decontamination procedures are available as an alternative to the measurement-based decontamination described in Section 6.3.2. Persons conducting decontamination are required to take measures to prevent the release of PCBs from the decontamination area and to use protective equipment to protect against dermal contact or inhalation of PCBs. Self-implementing decontamination procedures are found in §761.79.

6.3.4. Sampling and Recordkeeping for Measurement-Based Decontamination

Sampling is required for measurement-based decontamination but not for self-implementing decontamination. Written records of sampling activities must be maintained for at least 3-years following decontamination. The records must document that sampling was performed in accordance with the regulatory requirements

Documentation of compliance with self-implementing decontamination procedures must be maintained for a minimum of 3-years following completion of decontamination.

6.3.5. Decontamination Waste and Residue Management

Waste and residues from decontamination should be managed as PCB Remediation Waste at their existing PCB concentration unless otherwise specified. Note that decontamination solvents have specific requirements. Contact the Project Environmental Manager for specific requirements for the wastes generated.

6.3.6. Alternate Decontamination or Sampling Approval

If an alternate approval is required, contact the Project Environmental Manager who will notify the Kaiser-Hill ESS Program Manager to coordinate EPA approval of decontamination or sampling methods other than those defined by these requirements. EPA will issue a written decision based on the information.

7.0 PCB SPILL MANAGEMENT

A "PCB spill" includes leaks released or other unauthorized discharges where the release results in any quantity of PCBs running off or about to run off the external surface of the equipment or other PCB source. The EPA has very specific PCB spill cleanup requirements. The resulting spill cleanup wastes are categorized as PCB Remediation Waste for purposes of storage and disposal.

7.1. SPILLS THAT REQUIRE IMMEDIATE AND URGENT RESPONSE

Immediate response for certain PCB spills is required because these spills pose extraordinary risks (reference (§761.125 (a)). Spills in this category include:

- Spills resulting in direct contamination of surface waters.
- Spills resulting in direct contamination of sewers or sewage treatment systems.
- Spills resulting in the direct contamination of any private or public drinking water sources or distribution systems.

- Spills that migrate to and contaminate surface waters, sewers, or drinking water supplies before cleanup has been completed in accordance with the PCB Spill Cleanup Policy, which can be found at 40 C.F.R. §761.120 -135.
- Spills resulting in contamination of domesticated animal grazing lands.

The Project Environmental Manager should be notified of all PCB or PCB suspect spills.

7.2. SPILL NOTIFICATION AND RESPONSE

Chapter 9 of RFETS Chemical Management Manual (1-MAN-019-CMM-001) defines the reporting requirements for all spills or releases on Site including PCBs. Any Site employee who becomes aware of or suspects a PCB release is required to immediately stop work, warn co-workers of the incident, and if conditions are safe, isolate the spill area to minimize personnel exposure, and report the release to his supervisor or the Shift Manager of the area. If immediate notification of the employee's supervisor is not possible, the employee is required to notify the Shift Superintendent at extension x2914. The Project Environmental Manager will report all spills to the Kaiser-Hill Spill Notification and Reporting Representative as soon as possible after discovery.

The Kaiser-Hill Spill Notification and Reporting Representative will then report spills of PCBs greater than or equal to the reportable quantity (1 pound) to the National Response Center at 1-800-424-8802, and EPA. In accordance with the DOE Occurrence Procedures, the Facility Manager will categorize the spill incident within 2 hours.

Initial responses to spills will be coordinated through the Shift Superintendent's office. The Shift Superintendent or his/her designee will determine if the Fire Department Hazardous Materials Response Team (FD HMRT) is required for initial control and containment of the release. Spill response must be initiated immediately.

7.3. SPILL CLEANUP AND RECORDKEEPING

PCB spills at concentrations greater than 50 ppm that occurred after May 4, 1987 may be cleaned up in accordance with the requirements of the PCB Spill Cleanup Policy found at 40 C.F.R. Part 761, Subpart G, or in accordance with the requirements for PCB Remediation Waste found at 40 C.F.R. §761.61. Cleanup and disposal of other PCB spills or releases must meet the definition of PCB Remediation Waste in accordance with the requirements for PCB Remediation Waste found at 40 C.F.R. §761.61 and Section 8.2.3 of this Plan. The Project Environmental Manager should be involved early in cleanup strategies and should be consulted for regulatory requirements.

The organization responsible for the spill cleanup *must* document the spill cleanup in accordance with the requirements of the PCB Spill Cleanup Policy found at 40 C.F.R. §761.125(c)(5).

8.0 SUMMARY OF PCB MANAGEMENT PLANNING FOR OPERATIONS AND FACILITY DISPOSITION

This section summarizes the planning activities that will ensure compliance and facilitate efficient PCB management during Operations and Facility Disposition.

8.1. OPERATIONS

During operational activities, the Project is required to develop and maintain a current inventory of PCB liquids and PCB items (except for fluorescent light ballasts). The Project is also required to determine if the PCB liquids and PCB Items are authorized uses as described in, and in 40 CFR §761.30. If unauthorized uses are identified, the Project Environmental Manager must be notified.

When the Project determines that an authorized use has reached the end of its useful life, or requires "Removal from Service for Disposal", the authorized use becomes a waste. To enable disposal, the Project will determine the PCB concentration of oil-filled electrical equipment (if not completed previously) and other waste in accordance with the requirements of this Plan and 40 C.F.R. Part 761.

- The Project is required to ensure that PCB liquids and PCB Items that are removed from service are managed with all applicable requirements.

8.2. BUILDING STABILIZATION AND DEACTIVATION

Stabilization in buildings in which Special Nuclear Material (SNM) activities did not occur, and deactivation in buildings in which SNM activities did occur will be completed as part of Facility Disposition. Activities that may occur during this phase include inventory and removal of hazardous materials, which include PCBs. During this phase, the Project will:

- Update the inventory of PCBs to include all potential PCBs (PCB liquids and PCB items) and PCB wastes.
- Make a preliminary determination as to whether cleanup will be performed under TSCA or deferred to the Decommissioning stage.
- Conduct characterization activities as directed in this Plan and in 40 C.F.R. Part 761 to enable categorizing PCBs and PCB wastes into the categories.
- Identify and inventory potential PCB Bulk Product Wastes. Guidelines in this Plan should be used to identify the subset of PCB Bulk Product Wastes that will be disposed of using the solid waste disposal option and those that will require characterization and decontamination prior to disposition. For those items destined for distribution into commerce, the PCB concentration of the potential PCB-containing components of the PCB Bulk Product Waste should be characterized.
- All PCBs that are not essential to maintaining the building in a safe and stable condition should be removed.
- The Historical Release Report should be updated if additional information on releases of PCBs is discovered during this phase.

8.3. DECOMMISSIONING/MOTHBALLING

Activities comprising the decommissioning phase of Facility Disposition are presented in Section 2.3.4.2 of the Facility Disposition Program Manual (MAN-076-FDPM). DOE defines decommissioning in its Decommissioning Resource Manual (DOE/EM-0246, August 1995) to be that which takes place:

- After deactivation and includes surveillance and maintenance, decontamination and/or dismantlement. These actions are taken at the end of life of the facility to retire it from service with adequate regard for the health and safety of workers and the public and protection of the environment. The ultimate goal of decommissioning is unrestricted release or restricted use of the site.
- Surveillance and Maintenance is a program established during deactivation and continuing until phased out during decommissioning to provide in a cost-effective manner for satisfactory containment of contamination; physical safety and security controls; and maintenance of the facility in a manner that is protective of workers, the public, and the environment.

Mothballing, as defined in section 3.3.4 of the Decommissioning Program Plan (DPP) means placing a building in a condition where it is no longer actively occupied. Ventilation, heating, air conditioning, and

fire detection and protection systems may be turned off. Sump pumps to remove groundwater infiltration may be operating.

For these phases, the Project will:

- Continue to remove from service and store for disposal, or dispose of all PCBs that pose a risk of release to the environment and are not essential to maintaining the building in a safe and stable condition.
- Include the characterization of PCBs and PCB wastes in the Reconnaissance Level Characterization Report (RLCR) which is submitted to the Lead Regulatory Agency (LRA) before starting mothballing or decommissioning.
- Ensure that PCBs remaining in service pose no risk of release to the environment.
- For any remaining PCB spills, provide cleanup information for the "RFCA decision document" or prepare separate plan(s) under TSCA.
- Prepare a Project Closeout Report that documents all PCBs in the building have been removed or disposed in accordance with this Plan and 40 CFR Part 761. The Project Closeout Report will indicate if any residual PCBs remain in the environment.
- Update the Historical Release Report if additional information on releases is discovered during this phase.

8.4. RFCA PROCESS AS APPLICABLE TO PCB

Under most circumstances, the cleanup of environmental media contaminated with PCBs will be performed under the RFCA; however, under special circumstances, they may be cleaned up under TSCA requirements. The RFCA consultative process will be used to make this decision based on scope, schedule and regulatory criteria.

Releases of PCBs that are managed under CERCLA, as implemented through the RFCA, may be addressed through a release-specific, risk-based approach. The PCB cleanup requirements of TSCA, although not mandatory for CERCLA actions, will be evaluated as potential applicable or relevant and appropriate requirements (ARARs).

Management of PCB cleanups under the RFCA provides flexibility concerning the levels of PCB cleanup to be achieved. RFCA Tier I and II cleanup levels have been developed for many contaminants, including PCBs. These levels will be the default cleanup levels for PCBs. Consult Kaiser-Hill ESS for specific guidance.

9.0 RECORD KEEPING

9.1. PCB ANNUAL RECORDS AND ANNUAL DOCUMENT LOG

Kaiser-Hill must develop and maintain annual records and a written annual document log of the disposition of PCBs and PCB Items. Kaiser-Hill ESS personnel are responsible for compiling and submitting to DOE an *Annual Document Log* by July 1 each year for the previous calendar year (January through December). Both the annual records and *Annual Document Logs* must be available for inspection by authorized representatives of the EPA during normal business hours.

Copies of the following documents comprising the annual records must be submitted to ESS upon request.

- All signed manifests generated by the facility during the calendar year.
- All manifests signed by the off-site storage or disposal facility and returned to the RFETS.

- All Certificates of Disposal/Destruction that have been received by the facility during the calendar year.
- Inspection records.
- And other required documentation under 40 CFR Part 761, such as 15 day notifications to solid waste landfills, documentation of phone calls to transporters, exceptions reports, etc.

ESS will compile all regulatory reports consistent with requirements outlined in 40 CFR Part 761.

9.2. PCB SPILLS AND CLEANUP

Records of PCB spills or releases and cleanup will be maintained by the Kaiser-Hill Environmental Systems and Stewardship group. These records include, but are not limited to:

- Equipment description and ID number.
- Location of incident.
- Date and time of incident.
- Last test date for PCB concentration.
- The serial number of the equipment, where so labeled.
- Results of analysis for PCBs.
- Results of cleanup activities.
- Type of maintenance/service performed. (e.g., preventative [routine] maintenance, repair, safety-related maintenance, corrective action response).
- The operations performed (e.g., replaced gasket, drained fluid, etc.).
- Last test date for PCB concentration
- A copy of the closeout or completion verification.

9.3. RECORDKEEPING FOR MEASUREMENT-BASED DECONTAMINATION AND SAMPLING

Written records of sampling activities for measurement-based decontamination must be maintained for at least 3-years following decontamination. The records must document that sampling was performed in accordance with the regulatory requirements.

Documentation of compliance with self-implementing decontamination procedures must be maintained for a minimum of 3-years following completion of decontamination. **Note** – sampling is not required for self-implementing decontamination.

9.4. ADDITIONAL RECORDKEEPING REQUIREMENTS

The original documents identified below must be maintained for a minimum of 3-years after the facility ceases using or storing PCBs and PCB Items.

- Inspection records for PCB transformers and voltage regulators, PCB storage areas, and PCB waste container inspections.
- Service records for PCB items remaining in service include the following:
 - Equipment description and ID number.
 - Date first put in service.
 - Current location of equipment. (Former location(s) of equipment, if applicable).
 - Required maintenance/service interval.
 - Date and time of maintenance/service (when begun, when completed).

- Work Order or Maintenance Request Number.
- Name and employee number of personnel performing maintenance or service, or name of personnel and subcontractor company name.

9.5. EPA ID NUMBER

The EPA Identification Number at RFETS is the same for PCBs as the RCRA number-ID# CO7890010526.

9.6. MANIFESTING

The Kaiser-Hill Traffic Department will prepare and maintain manifests for each off-site shipment of PCB waste. The Traffic Department will also file copies of any manifest-related Exception Reports submitted to EPA with the copy of the PCB Waste Manifest to which it applies.

For each shipment of PCBs, the manifest must specify:

- For each bulk load of PCBs, the identity of the PCB waste, the earliest "Removal from Service for Disposal" date, and the weight in kilograms of the PCB waste.
- For each PCB Article Container or PCB container, the unique identifying number, type of PCB waste (e.g., soil, debris, small capacitor), the earliest "Removal from Service for Disposal" date, and weight in kilograms of the PCB waste contained.
- For each PCB Article not in a PCB Container or PCB Article Container, the serial number if available, or other identification if there is no serial number, the earliest "Removal from Service for Disposal" date, and weight in kilograms of the PCB waste in each PCB Article.

When Kaiser-Hill retains an independent transporter to transport PCB waste to a commercial storer or disposer, a representative of the Kaiser-Hill Traffic Department or Shipping and Disposal Group will confirm by telephone, or by other means of confirmation agreed to by both parties, that the commercial storer or disposer actually received the manifested waste. Such confirmation must be documented.

The Representative will confirm receipt of the waste by close of business the day after he/she receives the manifest hand-signed by the commercial storer or disposer. If the Representative has not received the hand-signed manifest within 35 days after the independent transporter accepted the PCB waste, the Representative shall telephone, or communicate with by some other agree-upon means, the disposer or commercial storer to determine whether the PCB waste has actually been received. If the PCB waste has not been received, the Representative will contact the independent transporter to determine the disposition of the PCB waste. The Representative will inform the Kaiser-Hill ESS Program Manager if the Representative has not received a hand-signed manifest from an EPA-approved facility within 10 days from the date of the telephone call or other agreed upon means of communication, to the independent transporter. The ESS Program Manager will prepare an exception report in accordance with Section 8.7 of this Plan. The Representative will retain a written record of all telephone or other confirmations to be included in the annual document log (See Section 8.1 of this Plan).

9.7. MANIFEST DISCREPANCIES

Manifest discrepancies are differences between the quantity or type of PCB waste designated on the manifest and the quantity or types of PCB waste actually delivered to and received by a designated facility.

Significant discrepancies in quantity are:

- Variations greater than 10% in weight of PCB weight in containers.
- Any variations in piece count, such as a discrepancy of one PCB transformer, PCB Container, or PCB Article Container in a truckload.
- Variations in waste type.

Whenever a PCB storage or disposal facility notes a discrepancy between the manifest and actual waste received from the RFETS, the facility is required to notify Kaiser-Hill in an attempt to reconcile the differences. If the discrepancies cannot be reconciled within 15 days after receiving the waste, the storage or disposal facility is required to notify the EPA. If such notification is made, Kaiser-Hill should obtain a copy of the EPA notification.

9.8. EXCEPTION REPORTING

If, after 35 days of the date PCB waste was accepted by the initial transporter, a signed copy of the manifest has not been received from the designated storage or disposal facility, Kaiser-Hill must contact the waste transporter and/or the owner or operator of the designated facility to determine the status of the PCB waste.

9.8.1. Exception Reports for Non-Receipt of PCB Waste Manifest from Disposal Facility

The Traffic Representative must notify ESS when the receiving PCB disposal facility has not returned a copy of the manifest with the handwritten signature of the owner or operator of the facility within 45 days of the date the waste was accepted by the initial transporter. ESS will then prepare an Exception Report consistent with requirements of 40 CFR Part 761.

9.9. CERTIFICATES OF DISPOSAL/DESTRUCTION

The Kaiser-Hill Traffic Department must maintain original Certificates of Disposal/Destruction and provide copies to the ESS Program Manager upon request. The managing facility must submit certificates consistent with the requirements outlined in the FUD.

10.0 TERMS AND DEFINITIONS**Table 3 - PCB Terms and Definitions**

Terms	Definitions
Building Stabilization	Deactivation activities in non-nuclear buildings. These are activities necessary to remove a building from operation and place the building in a safe and stable condition so that the building and its contents are in a condition that eliminates or mitigates hazards and ensures adequate protection to workers, the public, and the environment.
Bulk PCB Remediation Waste	Includes, but is not limited to, the following non-liquid PCB Remediation Waste: soil, sediments, dredged materials, muds, PCB sewage sludge and industrial sludge.
Commercial Storer of PCB Waste	Any facility subject to the standards of 40 C.F.R. §761.65 that (1) stores PCB waste generated by others or (2) removed PCB waste while servicing equipment owned by others would qualify the owner or operator as a commercial storer; the receipt of a fee or any form of compensation for storage services is not necessary to qualify as a commercial storer of PCB waste. A DOE facility that receives >500 gallons of PCB waste containing PCBs at regulated levels, generated by sources other than DOE, is not required to seek approval as a commercial storer.
Deactivation	Applicable to nuclear buildings; the process of placing a building, portion of a building, structure, system, or component in a safe and stable condition to minimize the long-term cost of a surveillance and maintenance program in manner that is protective of workers, the public and the environment. (See RFCA for full definition).
Decommissioning	Applicable to nuclear buildings; the process of placing of buildings, structure, systems, or component in which deactivation occurs, all activities that occur after deactivation. (See RFCA for full definition).
Disposition	The sequence of activities required to take a building/facility from its existing condition to its final disposition. It includes removal of property, waste, chemicals, special nuclear material and holdup, stripout of fixed equipment, decontamination, demolition, waste removal or emplacement, and the characterization and planning necessary to support any or all of the above. Building/Facility Disposition is distinguished from landlord activities in that landlord activities are those that occur in order to keep building in its current, operating condition.

Terms	Definitions
Distributed in Commerce	To sell, or the sale of, the substance, mixture, or article in commerce; to introduce or deliver for introduction into commerce, or the introduction or delivery for introduction into commerce of the substance, mixture, or article; or to hold or the holding of, the substance, mixture or article after its introduction into commerce.
Dry weight	For non-liquid PCBs, the weight of the sample, excluding the weight of the water in the sample.
Enclosed manner	Any configuration or design that prevents exposure to human beings or the environment.
Excluded PCB products	PCB materials that appear at concentrations less than 50 ppm. The resulting PCB concentration (i.e. below 50 ppm) cannot be a result of dilution, or leaks and spills of PCBs in concentrations over 50 ppm.
Fluorescent light ballasts	A device that electrically controls fluorescent light fixtures and that includes a capacitor containing 0.1 kg or less of dielectric fluid
Generator of PCB waste	Any person whose act or process produces PCBs that are regulated for disposal under subpart D, or whose act first causes PCBs or PCB Items to become subject to the disposal requirements under subpart D, or who has physical control over the PCBs when a decision is made that the use of the PCBs has been terminated and therefore is subject to the disposal requirements.
IDC	Item Description Code.
Large High Voltage Capacitor	A capacitor that contains 1.36 kg (3 pounds) or more of dielectric fluid and that operates at or above 2,000 volts (a.c. or d.c.)
Large Low Voltage Capacitor	A capacitor that contains 1.36 kg (3 pounds) or more of dielectric fluid and that operates below 2,000 volts (a.c. or d.c.)
Leak	Any instance in which a PCB Article, PCB Container, or PCB Equipment has any PCBs on any portion of its external surface.
Liquid PCBs	A homogeneous flowable material containing PCBs and more than 0.5 per cent by weight non-dissolved material.
Manifest	The shipping document EPA form 8700-22 and any continuation sheet attached to EPA form 8700-22, originated and signed by the generating facility.

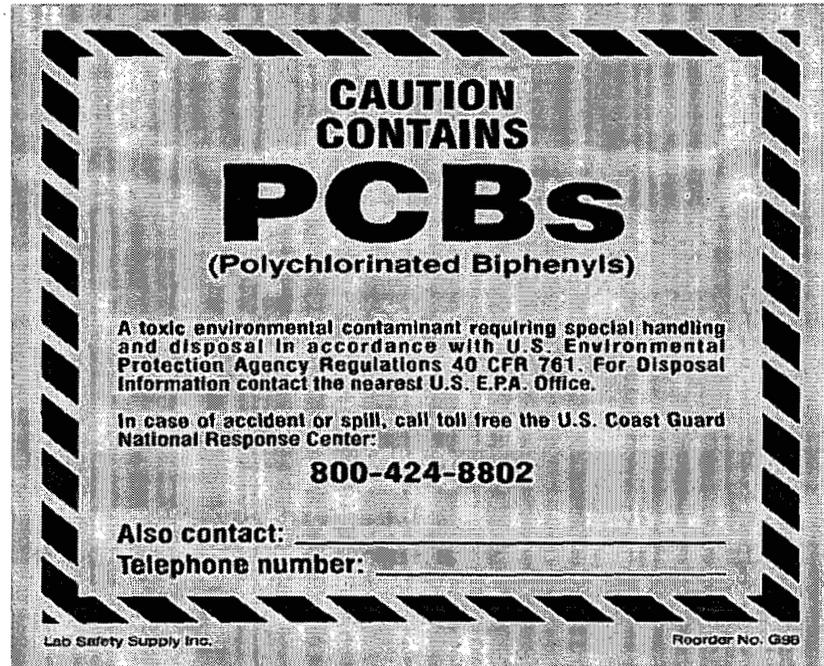
Terms	Definitions
Mark	A label that includes the descriptive name, instructions, cautions, or other information applied to PCBs and PCB Items, or other objects subject to these regulations.
Marked	The marking of PCB Items and PCB storage areas and transport vehicles by means of applying a legible mark by painting, fixation of an adhesive label, or by any other method that meets the requirements of the regulations.
Mothballing	Placing a building in a condition where it is no longer actively occupied. Ventilation, heating and air conditioning, and fire detection and protection systems may be turned off.
Non-liquid PCBs	Materials containing PCBs that by visual inspection do not flow at room temperature or from which no liquid passes when a 100 g or 100 ml representative sample is placed in a mesh number 60 ± 5 percent paint filter and allowed to drain at room temperature for 5 minutes.
Non-porous surface	A smooth, unpainted solid surface that limits penetration of liquid containing PCBs beyond the immediate surface. Examples are: smooth uncorroded metal; natural gas pipe with a thin porous coating originally applied to inhibit corrosion; smooth glass; smooth glazed ceramics; impermeable polished building stone such as marble or granite; and high density plastics.
PCB and PCBs	Chemical substances containing the biphenyl functional group that has been chlorinated to varying degrees. For purposes of disposal, PCBs are either PCB liquids or PCB items.
PCB Article	Any manufactured article, other than a PCB Container, that contains PCBs and whose surface has been in direct contact with PCBs. PCB Articles includes pumps motors, pipes and other manufactured items, which are (1) formed to a specific shape or design during manufacture, and which (2) have end use functions dependent in its shape or design and (3) which have either no change of chemical composition during its end use or only those changes of composition which have no commercial purpose separate from that of the PCB Article.
PCB Article Container	Any package, can, bottle, bag, barrel, drum, tank, or other device used to contain PCB Articles or PCB Equipment, and whose surface has not been in direct contact with PCBs.

Terms	Definitions
PCB Bulk Product Waste	Waste derived from manufactured products containing PCBs in a non-liquid state, at any concentration where the concentration at the time of designation for disposal was ≥ 50 ppm PCBs. PCB Bulk Product Waste excludes PCBs or PCB Items, but includes: 1) non- liquid bulk wastes or debris from the demolition of buildings and other man-made structures; 2) PCB-containing wastes from the shredding of automobiles, household appliances, or industrial appliances; 3) plastics, preformed or molded rubber parts and components, applied dried paints, varnishes, waxes, or other similar coatings or sealants; caulking; adhesives; paper, Galbestos; sound- deadening or other types of insulation; and felt or fabric products such as gaskets; 4) fluorescent light ballasts containing PCBs in the potting material.
PCB Capacitor	Any capacitor that contains ≥ 500 ppm PCB.
PCB Container	Any package, can, bottle, bag, barrel, drum, tank, or other device that contains PCBs or PCB Articles and whose surface(s) has been in direct contact with PCBs.
PCB-Contaminated Equipment	Any electrical equipment, including but not limited to transformers, capacitors, circuit breakers, reclosers, voltage regulators, switches, electromagnets, and cable, that contain 50 ppm or greater PCB, but less than 500 ppm PCB. Oil-filled electrical equipment other than circuit breakers, reclosers, and cable whose PCB concentration is unknown must be assumed to be PCB-Contaminated Electrical Equipment.
PCB Equipment	Any manufactured item, other than a PCB container or a PCB Article container, that contains a PCB Article or other PCB Equipment, and includes microwave ovens, electronic equipment, and fluorescent light ballasts and fixtures.
PCB Item	Any PCB Article, PCB Article Container, PCB Container, or PCB Equipment, that deliberately or unintentionally contains or has a part of it any PCB or PCBs. <i>[Fluorescent light ballasts containing PCBs in the potting materials are regulated for disposal as PCB Bulk Product Waste. For the RFETS, assume that fluorescent light ballasts that do not exhibit the "No PCBs" mark, contain PCBs in the potting material and should be managed as PCB Bulk Product Waste].</i>

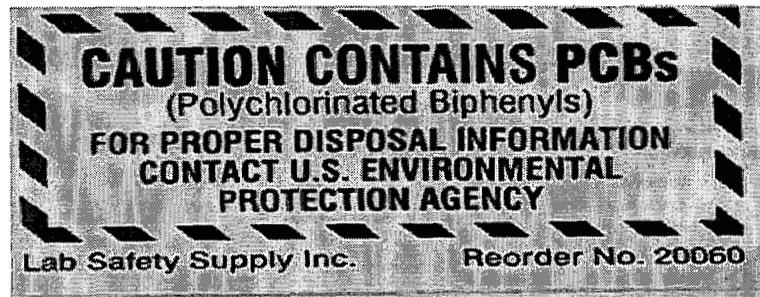
Terms	Definitions
PCB Remediation Waste	Wastes containing PCBs as a result of a spill, release, or other unauthorized disposal, at the following concentrations: Materials disposed of prior to April 18, 1978, that are currently at concentrations ≥ 50 ppm PCBs, regardless of the concentration of the original spill; materials which are currently at any volume or concentration where the original source was ≥ 500 ppm PCB beginning on April 18, 1978, or ≥ 50 ppm PCB beginning on July 2, 1979; and materials which are currently at any concentration if the PCBs are from a source not authorized for use under 40 C.F.R. 761. (See also definition of <i>Bulk PCB Remediation Waste</i>).
PCB Transformer	Any transformer that contains ≥ 500 ppm PCB.
PCB waste	PCB waste(s) means those PCBs and PCB Items that are subject to the disposal requirements of §761.50 - §761.79, Subpart D - Storage and Disposal; and is applicable to PCB liquids, PCB Items, PCB Remediation Waste; PCB Bulk Product Waste, PCB/radioactive waste; PCB household waste, PCB research and development waste; and porous surfaces.
PODF	Performance-based organic decontamination fluid means kerosene, diesel fuel, terpene hydrocarbons, and terpene hydrocarbon/alcohol mixtures.
Porous surface	Any surface that allows PCBs to penetrate or pass into itself including, but not limited to, paint or coating on metal; corroded metal; fibrous glass or glass wool; unglazed ceramics, ceramics with a porous glaze; porous building stone, low-density plastics; coated or uncoated wood; concrete or cement; plaster; plasterboard; wallboard; rubber; fiberboard; chipboard; asphalt; or tar paper.
ppm	parts per million.
R&P for PCB Disposal	Demonstrations for commercial PCB disposal approvals, pre- demonstration tests, tests of major modifications to previously approved PCB disposal technologies, treatability studies for PCB disposal technologies which have not been approved, development of new disposal technologies, and research on chemical transformation processes including, but not limited to, biodegradation.
Removal from Service For Disposal Date Retrofill	The date at which PCBs were determined to be waste and the decision was made to dispose of them. To remove PCB or PCB- contaminated dielectric fluid and to replace it with either PCB, PCB-contaminated, or non-PCB dielectric fluid.

Terms	Definitions
Remediation Waste	RFCA defines remediation waste as: (1) solid, hazardous, and mixed waste; (2) all media and debris that contains hazardous substances, listed hazardous or mixed waste or that exhibit hazardous characteristics; and (3) all hazardous substances generated from activities regulated under RFCA or RCRA corrective actions or CERCLA response actions, including decommissioning. Remediation waste does not include waste generated from other activities. Nothing in this definition confers RCRA or CHWA authority over source, special nuclear, or byproduct material as those terms are defined in Atomic Energy Act.
Small quantities for Research and development	Any quantity of PCBs (1) that is originally packaged in one or more hermetically sealed containers of a volume of no more than five milliliters, and (2) that is used only for purposes of scientific experimentation or analysis, or chemical research on, or analysis of, PCBs, but not for research or analysis for the development of a PCB product.
Spill	A spill includes leaks and other uncontrolled discharges where the release results in any quantity of PCBs running off or about to run off the external surface of the equipment or other PCB source, as well as contamination resulting from those releases.
Totally enclosed manner	Any configuration or design that will ensure no exposure of human beings or the environment to any concentrations of PCBs.
TSCA	Toxic Substances Control Act
WEMS	Waste and Environmental Management System - a RFETS computer database that tracks waste packages from the point of generation until shipped off-site.
Wet weight	Reporting chemical analysis results by including either the weight, or the volume and density, of all liquids.
WFC	Waste Form Code.

Appendix 1 - Markings
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EPA- Approved PCB Large Mark (ML)



EPA- Approved PCB Small Mark (MS)

Appendix 2 - PCB Storage for Disposal Area Inspection Checklist

PCB "Storage for Disposal Area" Inspection Checklist

Inspected By: _____ Employee No. _____ Date _____
 Inspector's Signature _____
 Building No: _____ Room No. _____ Area ID# _____
 Area Custodian _____ Phone/Pager/Fax _____
 Operations Manager: _____ Phone/Pager/Fax _____

Date of Next Inspection _____

(Inspections must be performed at least once every 30 days)

MARK THE APPROPRIATE BOX (YES OR NO) "NO" ANSWERS REQUIRE A DESCRIPTION OF CORRECTIVE ACTION AND COMPLETION DATES	YES	NO	CORRECTIVE ACTIONS/COMPLETION DATES
1. Was the last inspection conducted within the previous 30 days? Date of last inspection _____.			
2. Are all containers marked with the large PCB mark (M _L)? Number of containers in storage area _____?			
3. Are all entrances to the storage area marked with the large PCB mark (M _L)?			
4. Are nonradioactive PCBs in this area stored in containment with a continuous curb that is at least six inches in height, or are the containers stored within a salvage container?			
5a. Does the containment have a volume of at least two times the internal volume of the largest PCB article or PCB container, or 25% of the total volume of all PCB articles or PCB containers stored, whichever is greater?			
5b. Have salvage containers been opened and inspected for leaks during this quarter (i.e. Jan-Mar; Apr-Jun; Jul-Sep; Oct-Dec)? Ref: the PCB Internal Salvage Container Inspection Log.			
6. Is the floor free from any openings such as drain valves, floor drains, expansion joints, lines, etc.?			
7. Are the floor and containment curbing constructed of continuous smooth and impervious materials, such as Portland cement concrete or steel?			
8. Are roof and walls adequate to prevent rainwater from reaching the stored PCBs and PCB items?			
9. Are all containers in good condition and non-leaking?			
10. Is the "Removal from Service for Disposal" date recorded on the Waste/Residue Traveler for each PCB item in each Container?			
11. Verify via WEMS Report – are all non-radioactive PCBs being stored for less than 9 months?			

Inspector: Retain original for your records; forward copy to the PCB Program Manager within 10 calendar days.

Appendix 3 - PCB Temporary Storage Area Inspection Checklist
(Page 1 of 1)

Applicability: This checklist must be completed at least once every 30 days for 30-day temporary PCB storage areas and for 180-day temporary PCB storage areas that contain stored nonradioactive and radioactive PCBs. Only the items listed below are approved for temporary storage.	
Prerequisites: If this is a new storage area, the Storage Area Custodian must complete a storage area authorization before storing wastes. The authorization must be completed in accordance with WEMS Procedure "Controls for Updating Waste Package Information in WEMS" (1-PRO-Q11-WO-122).	
Items approved for temporary 30-day storage	Items approved for temporary 180-day storage
Non-leaking PCB Articles and PCB Equipment.	PCB Bulk Product Waste (includes PCB fluorescent light ballasts, does not include small or large capacitors).
Leaking PCB Articles and PCB Equipment if the PCB Items are placed in a non-leaking PCB Container that contains sufficient sorbent material to absorb any liquid PCBs remaining in the PCB Items.	Bulk PCB Remediation Waste.
PCB Containers holding non-liquid PCBs such as contaminated soils, rags, and debris.	
PCB Containers holding liquid PCBs at a concentration between 50 and 500 ppm, provided a Spill Prevention Control and Countermeasure Plan (SPCC) has been prepared for the "Temporary Storage Area" (Note: The Site-wide SPCC addresses PCB "Temporary Storage Areas").	

Building Location: _____ Area or Unit ID #: _____
 Date of Inspection: _____ Circle One: 30-day temporary area 180-day temporary area
 Name of Inspector: _____ Employee Number _____ Ext. _____
 Inspector's Signature: _____ Unit Custodian: _____ Ext. _____

INSPECTION ITEMS (USE FOR BOTH 30-DAY AND 180-DAY STORAGE AREAS)	Y/N* or N/A
1. Are all PCB Containers in the storage area marked with the large PCB Mark (6"x6" label)?	
2. Is the "Temporary Storage Area" posted in a visible location (wall or floor stand) with the large PCB Mark?	
3. Is there a "Removal from Service for Disposal" date recorded on the container Log Sheet for each PCB item in the Container?	
4. Have all items, that are currently in storage, been stored for less than 30-days (180 days for 180-day areas)?	
5. Are only approved items stored in the "Temporary Storage Area"?	
6. Are all Containers in good condition and non-leaking?	
7. If the waste is stored outside in a pile, is the pile designed and operated to control dispersal of the waste by wind (N/A, if not applicable)?	
8. If the waste is stored outside, have measures been taken to ensure that leachate will not be generated through decomposition of the waste or through other reactions (N/A, if not applicable)?	
9. If the waste is stored outside, does the storage site have a liner (e.g. catch pan) and a liner foundation that prevents migration of wastes and failure of the liner (N/A, if not applicable)?	
10. If the waste is stored outside, is the waste covered with a cover designed to prevent contact of the waste with precipitation, and secured to prevent wind damage (N/A, if not applicable)?	
11. If the waste is stored outside, is the waste stored in a manner to prevent contact of the waste with run-on and to prevent run-off (N/A, if not applicable)?	

***All "No" responses require an explanation and a description of corrective actions:**

Inspection Item #	Explanation and Corrective Action
_____	_____
_____	_____
_____	_____

33/33