

ATTACHMENT II-1-10.1

MANAGEMENT OF WASTE CONTAINING POLYCHLORINATED BIPHENYLS (PCBs) AT THE LLRW FACILITY

1. INTRODUCTION

This Attachment shall govern the acceptance, storage, and disposal of PCB wastes in the LLRW Facility at Clive.

2. SCOPE

This Attachment shall apply to all PCB/Radioactive Waste received at the Permittee's facility for management in the LLRW Disposal Cell(s).

3. OBJECTIVES

Requirements within this Attachment are designed to prevent PCB waste from coming into direct contact with the environment (e.g., natural soils) or infiltrating into the groundwater at the Facility. This Attachment outlines controls or requirements associated with:

- a. PCB Waste Identification (Section 4)
- b. Prohibitions (Section 5)
- c. PCB Waste Characterization (Section 6)
- d. PCB Waste Acceptance (Section 7)
- e. Frequency of Analysis and Sample Collection (Section 8)
- f. PCB Waste Storage (Section 9)
- g. PCB Waste Disposal (Section 10)
- h. Environmental Monitoring (Section 11)
- i. Reporting and Notification (Section 12)
- j. Decontamination (Section 13)
- k. Spill Response and Prevention (Section 14)
- l. Retention of Records (Section 15)

4. PCB WASTE IDENTIFICATION

- a. The Permittee shall only accept PCB wastes (and non-PCB wastes as defined by Condition 4.c.ii.) that are defined as PCB/Radioactive Waste.
- b. PCB/Radioactive Waste shall be defined as wastes that are characterized as radioactive and that also contain PCBs.
- c. PCB/Radioactive Waste to be accepted for disposal is subject to the following definitions:
 - i. PCB – Any chemical substance that is limited to the biphenyl molecule that has been chlorinated to varying degrees or any combination of substances which contain such substance.
 - ii. PCB waste are classified for disposal as follows:
 1. Non-PCB Waste – PCBs or PCB Items with PCB as-found concentrations < 50 parts per million (ppm) that have not been diluted to attain the final concentration, or PCB Items in which the PCBs have been removed through the decontamination procedures of 40 CFR 761.79. Wastes that have been diluted to PCB concentrations < 50 ppm remain PCB or PCB-Contaminated “Waste” based upon the non-diluted PCB concentration. This exception is applicable to PCB bulk remediation wastes described in Condition 4.d.i.
 2. PCB-Contaminated Waste – PCBs or PCB Items containing PCBs at concentrations ≥ 50 ppm but < 500 ppm, or a non-porous surface having a surface PCB concentration $> 10 \mu\text{g}/100 \text{cm}^2$ but < $100 \mu\text{g}/100\text{cm}^2$, measured by a standard wipe test as defined in 40 CFR 761.123.
 - iii. PCB Item – Any PCB Article, PCB Article Container, PCB Container, PCB Equipment, or anything that deliberately or unintentionally contains or has as part of it any PCB or PCBs.
 - iv. Drained – All free-flowing liquids have been removed from the PCB Item, and sufficient absorbent material added to absorb any residual free-liquids.
 - v. Decontamination – The appropriate procedures, defined in 40 CFR 761.79 to remove PCBs from non-porous surfaces, concrete, and non-porous surfaces covered with a porous surface, such as paint or coating on metal.

- vi. Incidental Liquid – Liquid from incidental sources, such as precipitation, condensation, leachate or load separation [40 CFR 761.60(a)(3)]. To be considered incidental liquid, the liquid cannot have an oily sheen or must be analyzed and have a Total Organic Carbon (TOC) concentration less than 10% or a PCB concentration less than 500 ppm.
 - vii. General PCB Item definitions such as PCB-Contaminated Articles, PCB-Contaminated Electrical Equipment, PCB Containers, and PCB Article Containers are found in 40 CFR 761.3.
- d. The following PCB/Radioactive waste may be accepted for disposal in accordance with Utah Admin. Code R315-315-7 (40 CFR 761):
- i. Bulk PCB remediation wastes include non-liquid soil, sediments, dredged materials, muds, sewage sludge, and industrial sludge with a PCB concentration < 50 ppm that were removed for disposal under 40 CFR 761.61(a) or (c) category. See Utah Admin. Code R315-315-7(2)(a).
 - ii. Intact, non-leaking PCB Small Capacitors from fluorescent lights (Utah Admin. Code R315-315-7(2)(c)) in which the potting material contains less than 50 ppm PCBs.
 - iii. PCB bulk product waste is defined as plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); 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; felt or fabric products such as gaskets; non-liquid building demolition debris; or non-liquid PCB bulk product waste from the shredding of automobiles or household appliances from which PCB small capacitors have been removed (shredder fluff). See Utah Admin. Code R315-315-7(3)(b)(i).
 - iv. Drained PCB-Contaminated (PCB Concentration \geq 50 ppm but < 500 ppm) Electrical Equipment. See Utah Admin. Code R315-315-7(3)(b)(ii).
 - v. Drained PCB-Contaminated (PCB Concentration \geq 50 ppm but < 500 ppm) Articles. See Utah Admin. Code R315-315-7(3)(b)(iii).
 - vi. Non-liquid cleaning materials and personal protective equipment waste at any concentration, including non-porous surfaces and other non-liquid materials such as rags, gloves, booties, other disposable personal protective equipment, and similar materials resulting from cleanup activities of PCB remediation wastes. See Utah Admin. Code R315-315-7(3)(b)(iv).

- vii. Other PCB bulk product waste, sampled in accordance with the protocols in 40 CFR 761 Subpart R, that leaches PCBs at < 10 micrograms per liter ($\mu\text{g/L}$; 10 parts per billion [ppb]) of water measured using a procedure used to simulate leachate generation. See Utah Admin. Code R315-315-7(3)(b)(v).
- viii. Non-liquid wastes from wastes generated as a result of research and development activities and chemical analysis of PCBs authorized under Utah Admin. Code R315-315-7(3)(b)(vi).
- e. Drained PCB Containers that were used to contain PCBs at concentrations ≥ 50 ppm but < 500 ppm may be accepted for disposal provided that all free liquid is drained from the container; however, a hazardous waste manifest is required for this waste type (See 40 CFR 761.60(c)).
 - i. PCB Containers that hold waste may be disposed as part of the waste and do not need to be manifested as a separate waste type.
- f. Intact non-leaking PCB Small Capacitors may be accepted for disposal (see 40 CFR 761.60(b)(2)(ii)).

5. PROHIBITIONS

The prohibitions described in this part pertain to the receipt of waste containing PCBs that are received at the LLRW Facilities. These prohibited wastes may be acceptable at the Mixed Waste Facility. Refer to Attachment II-1-10, *Management of Waste Containing Polychlorinated Biphenyls (PCBs) at the Mixed Waste Facility*, for prohibitions at the Mixed Waste Facility.

- a. The Permittee is prohibited from receiving liquids that contain PCBs.
- b. With the exception of non-liquid cleaning materials (see Condition 4.d.v.), the Permittee is prohibited from receiving PCB Remediation Waste with a PCB concentration ≥ 50 ppm or PCB surface contamination $\geq 100 \mu\text{g}/100 \text{ cm}^2$.
- c. The Permittee is prohibited from receiving non-liquid PCB remediation wastes with non-diluted PCB concentration ≥ 1 ppm that were removed for disposal under the performance-based disposal category (40 CFR 761.61(b)).
- d. The Permittee is prohibited from receiving PCB Bulk Product Waste that is presumed or known to leach PCBs at $\geq 10 \mu\text{g/L}$.
- e. The Permittee is prohibited from receiving PCB Transformers previously containing PCBs at concentrations ≥ 500 ppm.
- f. The Permittee is prohibited from receiving intact PCB Large Capacitors.

- g. The Permittee is prohibited from receiving fluorescent light ballasts containing PCBs (≥ 50 ppm) in the potting material.
- h. The Permittee is prohibited from receiving Hydraulic Machines previously containing PCBs at concentrations $\geq 1,000$ ppm.
- i. The Permittee is prohibited from receiving Hydraulic Machines previously containing PCBs at concentrations ≥ 50 ppm but $< 1,000$ ppm that have not been decontaminated in accordance with 40 CFR 761.79.
- j. The Permittee is prohibited from receiving other drained PCB Articles previously containing PCBs at concentrations ≥ 500 ppm.
- k. The Permittee is prohibited from receiving drained PCB Containers for disposal that were used to contain PCBs at concentrations ≥ 500 ppm unless they have been decontaminated in accordance with 40 CFR 761.79.
- l. The Permittee is prohibited from receiving drained PCB Containers for disposal that were used to contain PCBs at concentrations ≥ 50 ppm and < 500 ppm without a uniform hazardous waste manifest.
- m. The Permittee is prohibited from receiving PCB waste from a generator (or the generator's transporter) when there is not a current, valid, and acceptable Notice to Transport for the waste stream on file at the Facility.

6. PCB WASTE CHARACTERIZATION

- a. Prior to shipment, the Permittee shall obtain a description of the material to be managed at the Facility. This characterization shall be documented using a Waste Profile Record.
- b. The Permittee shall only use analytical-test methods in accordance with Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, EPA Publication SW-846, Third Edition (or most current edition), or equivalent methods approved by the Director pursuant to R315-2-15.
- c. PCB waste shall not be diluted in order to avoid any provision of specifying a PCB concentration in accordance with 40 CFR 761. PCB concentration determination shall be made from "as-found" sampling. Re-sampling of waste in containers shall not be considered "as-found" sampling.
- d. PCB sampling and analysis is not necessary for "debris" waste types including those listed in Conditions 4.d.ii., 4.d.iii., 4.d.iv., 4.d.v., 4.d.vi., 4.d.viii, 4.e., and 4.f.
- e. Chemical analysis used to perform PCB quantitation shall be reported on a

dry/weight or wet/weight basis as determined by the PCB waste form.

- f. The Permittee shall only accept analytical results from a laboratory meeting the requirements in Attachment II-1, *Waste Analysis Plan*.
- g. The Permittee shall make PCB waste management decisions based only on accurate and valid analytical data and information.
- h. Only after the PCB components of the waste are characterized, analyzed, and meet all the provisions of this Attachment, and other allied Licenses and Permits, shall the Permittee provide the generator with a Notice to Transport. The Notice to Transport shall indicate that the waste contains PCBs.
- i. Deferred Chemical Screening Parameters / PCB Analysis shall be performed on samples from incoming shipments in accordance with the current Waste Characterization Plan of the Permittee's Radioactive Material License (UT 2300249) and Utah Admin. Code R315-315-7, if necessary.

7. PCB WASTE ACCEPTANCE

- a. With the exception of drained PCB Containers and Intact PCB Small Capacitors, a uniform hazardous waste manifest is not required for PCB/Radioactive Waste acceptance at the LLRW Facilities.
- b. The Permittee shall perform an initial inspection of the shipment and shipping papers for compliance with this Permit, and Department of Transportation (DOT) and Division of Radiation Control (DRC) shipment regulations. Instances of non-compliance shall be recorded in the Facility Operating Record.
- c. The Permittee shall visually inspect shipments, and document each inspection, to confirm that the PCB waste meets the PCB waste types in the Waste Profile Record and that no other PCB waste classifications are present in the shipment.
- d. The Permittee shall visually inspect shipments, and document each inspection, to assure that the waste liner, when used, has not been breached and PCB waste has not come into contact with the container.
 - i. If the PCB container or liner has been breached, or if the shipment does not contain a liner, the Permittee shall perform sampling and analysis in accordance with 40 CFR 761 to determine PCB contamination of the container / conveyance (e.g., railcar, intermodal) or dispose of the container / conveyance with its associated waste. If sampling results show that the container / conveyance is contaminated, it shall either be:
 - 1. disposed of within a disposal cell; or

2. decontaminated in accordance with Condition 13.
- ii. The requirements of Condition 7.d.i. are not applicable to shipments containing solely PCB Bulk Product Waste.
 - iii. The Permittee shall immediately withdraw its Notice to Transport to any generator whose PCB waste shipment has a container that has been breached. The Permittee shall not reinstate the Notice to Transport or issue a new Notice to Transport until a corrective action plan has been approved by the Permittee and notification has been provided to the Director with a copy of the corrective action plan.
- e. Drained PCB Items listed in Conditions 4.d.iv. and 4.d.v. shall be visually inspected to confirm that they are drained and that no free-flowing liquids are present.
 - f. PCB/Radioactive Waste Acceptance
 - i. The Permittee shall visually inspect each shipment for free liquids. For containerized waste shipments, this inspection shall be conducted for each container in the shipment.
 - ii. If free liquids are present, the Permittee shall take one of the following actions:
 1. the entire shipment may be rejected for receipt and disposal and the waste shall be returned to the generator or another permitted facility that can accept the PCB liquid waste; or
 2. the specific containers with free liquids within the shipment may be rejected for receipt and disposal and the waste shall be returned to the generator or another permitted facility that can accept the PCB liquid waste; or
 3. if the liquid doesn't have an oily sheen, the liquid may be sampled and analyzed for TOC or for PCBs and managed as an incidental liquid in accordance with Condition 10.g. if the TOC is less than 10% or the total PCB concentration is less than 500 ppm; or
 4. the container of liquid PCB waste may be re-profiled for management at the Mixed Waste Facility as a waste that is permitted to have PCBs in liquid form; or
 5. the liquid may be separated from the solid portion of the waste and re-profiled separately for management at the Mixed Waste Facility as a waste that is permitted to have PCBs in liquid form.

- iii. If a shipment arrives in a leaking condition, the Permittee shall manage the leaking shipment in accordance with Attachment II-6, *Contingency Plan*.
 - iv. When a determination has been made to reject a shipment or containers within a shipment, the Permittee shall withdraw the Notice to Transport for all PCB waste streams from that particular generator. The Permittee shall not reinstate the Notice to Transport(s) or issue new Notice to Transport(s) until a corrective action plan has been approved by the Permittee and notification has been provided to the Director with a copy of the corrective action plan and its approval.
 - v. Shipments of PCB waste which remain in transportation equipment or vehicles (rail cars, flatbeds, vans, trucks, etc.) and which are awaiting analyses or results may remain at the Permittee's facility for up to 30 calendar days unless additional time is requested in writing and approved by the Director in advance of the end of the 30 day limit.
- g. PCB/Radioactive Waste Discrepancy Resolution
- i. Where discrepancies are identified, the discrepancies shall be noted in the Operating Record and resolved with the generator.
 - ii. Discrepancies shall be addressed, resolved, and documented prior to disposal.
 - iii. Shipments with discrepancies may be placed in storage pending resolution.
 - iv. After discrepancies have been addressed and resolved, the shipment shall be managed in accordance with this Attachment.
 - v. Discrepancies, such as simple, non-factual typographical errors that are overlooked or discovered at a later date, shall be resolved by making corrections as information becomes available.
 - vi. Discrepancies, when found, that change the required management of the waste shall be resolved and managed in accordance with the current Waste Characterization Plan of the Permittee's Radioactive Material License (UT 2300249).
 - vii. Should a shipment involve containers which are open, leaking, or extensively damaged, the Permittee shall manage the affected waste so that the shipment no longer has open, leaking, or extensively damaged containers and manage the shipment in accordance with Attachment II-6, *Contingency Plan*, or arrange for the return of the shipment to the generator. After two such occurrences from a generator, the Permittee

- shall withdraw the Notice to Transport for all PCB waste streams from that particular generator. The Permittee shall not reinstate the Notice to Transport or issue a new Notice to Transport until a corrective action plan has been approved by the Permittee and notification has been provided to the Director with a copy of the corrective action plan and its approval.
- viii. Appearance discrepancies other than an appearance discrepancy with the PCB waste types in Condition 4 may be resolved by adding information to the Waste Profile Record following consultation with the generator.
 - ix. If the Permittee accepts a waste with a significant discrepancy in type (as defined in Condition 7.c.) and the discrepancy is not resolved with the generator within 15 calendar days after the date of arrival (as defined in Module I, *Standard Conditions*), the Permittee shall submit to the Director and to the EPA Region 8 Administrator a copy of the manifest or shipping paper at issue and a letter describing the discrepancy and attempts to reconcile it. This action shall be performed within three days after the 15-day time limit has expired.
 - 1. If the discrepancy is dependent on analytical data, then this notification shall be made within five calendar days of receiving the analytical data.
 - x. The Permittee shall receive written confirmation from the generator for all changes made. This confirmation shall be placed in the Operating Record.
 - 1. Corrections to paper records shall be made by striking out the incorrect information and writing the correct information on the page as near the error as practicable or updating information designated by the generator.
 - A. These corrections shall be initialed and dated by the person making the correction.
 - 2. Electronic records shall not require correction as long as the generator confirmation is kept with the record.
 - h. Requirements for waste with debris:
 - i. PCB waste sampling may be waived similar to other wastes in accordance with Condition I.14 of Attachment II-1, *Waste Analysis Plan*.
 - ii. For the waste types defined in Conditions 4.d.ii., 4.d.iii., 4.d.iv., 4.d.v., 4.d.vi., 4.d.viii, 4.e., and 4.f, the Permittee may waive the PCB sampling and analytical requirements.

i. **Non-Conforming Results:**

- i. If the results of the Deferred Chemical Screening Parameters analysis show that the waste is beyond the radiological limits of the Permittee's Radioactive Material License (UT 2300249), or a discrepancy exists between the PCB/Radioactive Waste profiled and the PCB/Radioactive Waste received, the Permittee shall perform the following:
 1. If the waste is not yet disposed, the Permittee shall:
 - A. Either manage it as Mixed Waste or return the waste to the generator or ship the waste to another facility that is permitted to manage the waste type; and
 - B. Immediately withdraw the Notice to Transport for that waste stream. The Permittee shall not reinstate the Notice to Transport or issue a new Notice to Transport until a corrective action plan has been approved by the Permittee and notification has been provided to the Director of the Division of Solid and Hazardous Waste with a copy of the corrective action plan and its approval.
 2. If the waste is disposed in a LLRW Disposal Cell, the Permittee shall:
 - A. Within 24 hours of discovering that non-conforming material had been disposed, notify the Directors of the Division of Solid and Hazardous Waste and the Division of Radiation Control of the situation;
 - B. Immediately withdraw the Notice to Transport for that waste stream. The Permittee shall not reinstate the Notice to Transport or issue a new Notice to Transport until a corrective action plan has been approved by the Permittee and notification has been provided to the Director of the Division of Solid and Hazardous Waste with a copy of the corrective action and its approval; and
 - C. Within seven calendar days of the notice, provide the Directors of the Division of Solid and Hazardous Waste and the Division of Radiation Control with a written description of the situation. The following information shall be included in the written description:
 - (1) Name of Generator;

- (2) Name of Non-Conforming PCB Waste Stream;
- (3) Amount of Non-Conforming Disposed PCB Waste;
- (4) Location of Non-Conforming PCB Waste in Disposal Cell;
- (5) Date Non-Conforming PCB Waste was Accepted;
- (6) Date Non-Conforming PCB Waste was Placed in Disposal Cell;
- (7) Description of Waste Placed on and Around Non-Conforming PCB Waste;
- (8) Plan of Action for Resolving Non-Conformance; and a
- (9) Compliance Schedule.

8. FREQUENCY OF SAMPLE COLLECTION AND ANALYSES REQUIREMENTS

- a. One rail car (any type) may represent a nominal 100 cubic yards; multiple intermodal containers upon a railcar may represent a nominal 20 cubic yards per intermodal container; and one highway shipment (any type) may represent a nominal 20 cubic yards. The Permittee may alternatively use the actual volumes for counting purposes. The Permittee shall indicate the use of actual or nominal volumes in the Operating Record and any reports, documents required by this Attachment, or requested by the Director.
- b. PCB/Radioactive Waste
 - i. Sample collection and frequency of analyses shall be performed in accordance with the current Waste Characterization Plan of the Permittee's Radioactive Material License (UT 2300249).

9. PCB WASTE STORAGE

- a. Upon acceptance of a shipment, the Permittee shall manage PCB waste as either bulk PCB waste or containerized PCB waste.
- b. The Permittee shall ensure that all PCB waste articles, equipment, and containers in storage have a label identifying the waste as PCB waste according to the requirements of 40 CFR 761.45.
- c. Bulk or containerized PCB/Radioactive Waste may be stored for up to 90 days

over approved liner in a designated area in the LLRW disposal cell.

- i. Designated storage areas in the LLRW disposal cell are not required to have PCB markings.
- d. Bulk or containerized PCB/Radioactive Waste may be stored on the Shredder Storage Pad in accordance with the requirements of the TSCA Approval.
 - i. Segregation is not required for PCB waste on the Shredder Storage Pad.
 - ii. PCB markings in accordance with 40 CFR 761.45(a) shall be posted at the Shredder Storage Pad, in each fence compass direction surrounding the Storage Pad and near the truck entrance.
 - iii. In order to clearly identify the generator number and the date on which PCB waste was received, the Permittee shall mark or place legible labels on containers placed into storage.
 - iv. The Shredder Storage Pad shall be inspected every day that waste is stored or shredded on the pad and waste is received or managed at the LLRW Facility.
 1. The daily inspection of the Shredder Storage Pad shall consist of visual observation of the physical integrity of visible areas of the storage area surface. Repairs shall be made when a displacement of the floor surface, as defined in Condition 10 of the EPA Approval, is discovered.
 2. Necessary repairs shall be completed before additional PCB wastes are managed at the Shredder Facility.
 - v. Each year during the second quarter, the Permittee shall remove all waste from the Shredder Storage Pad and perform a comprehensive inspection of the surface. If repairs are needed, they shall be completed before storing PCB waste on the pad.
 1. If repairs are performed on the Shredder Storage Pad, the EPA notification and reporting requirements described in the TSCA Approval shall be performed.
 2. All inspection and repair activities shall be noted in the Operating Record.
- e. PCB/Radioactive Waste received in railcars shall be managed in accordance with the Permittee's Radioactive Material License (UT 2300249).

10. PCB WASTE DISPOSAL

- a. Bulk PCB/Radioactive Waste that has been accepted and met the provisions of this Attachment and allied Licenses or Permits shall be offloaded and either
 - i. directly disposed in a LLRW Disposal Cell; or
 - ii. stored above approved liner in a designated area at the LLRW Disposal Cell for up to 90 days from the date the waste is accepted; or
 - iii. stored on the shredder pad in accordance with the requirements of the TSCA Approval.
- b. PCB/Radioactive Waste shall be processed at the Shredder Facility in accordance with the requirements of the TSCA Approval and this Attachment.
- c. PCB Small Capacitors (described in Conditions 4.d.ii. and 4.f.) shall not be processed through the Shredder.
- d. PCB/Radioactive Waste shall be disposed in accordance with the LLRW and 11e.(2) Construction Quality Assurance/Quality Control Plan.
- e. Disposal lift areas containing PCBs shall be covered to secure the exposed materials at the end of each working day (excluding non-dispersible PCB Bulk Product debris as outlined in Condition 7.h.). This covering may consist of:
 - i. Six inches of soil or soil-like non-PCB, non-hazardous material or waste;
 - ii. A commercial fixative, if approved by the Director and applied in accordance with the manufacturer's instructions; or
 - iii. Alternative covers such as tarps and plastics, if approved by the Director prior to their use.
- f. When waste is comprised of debris, the material shall be blended with fill material. The fill material shall be considered the cover.
 - i. After the blending has been completed, the lift area shall be visually inspected for the presence of dispersible debris. If dispersible debris is visible it shall be covered in accordance with Condition 10.e.
 - ii. Drained PCB-Contaminated Articles and PCB-Contaminated Electrical Equipment shall be placed in the disposal cell in preparation of a CLSM pour for final disposal without cover.
- g. Incidental Liquid shall be managed in accordance with Attachment II-1-4, *Liquid Waste Management Plan*.

11. ENVIRONMENTAL MONITORING

Attachment II-1-10.1

- a. Semi-annual Soil Monitoring shall be performed in accordance with the Environmental Monitoring Program referenced in the Permittee's Radioactive Material License (UT 2300249). Soil samples obtained from soil monitoring locations shall be analyzed for PCBs.
- b. At the request of the Director, groundwater monitoring samples shall be collected and analyzed for PCBs. Monitoring frequency shall be in accordance with Module VI, *Groundwater Monitoring*. Samples may be collected concurrent with LLRW sampling events. The analysis shall be performed using SW-846 Test Method 8082 or an equivalent Test Method, approved in writing by the Director. The Groundwater Concentration Limit for PCBs expressed as the total of all detectable Aroclors shall be 0.5 µg/L.
- c. During PCB shredding operations, sampling of accumulated wastewaters and sludges on the Shredder Pad shall be conducted in accordance with the TSCA Approval.
- d. Wastewater and sludge samples shall be collected annually and analyzed for PCBs, in all evaporation ponds that have received water collected from the Shredder Pad following PCB shredding operations.

12. REPORTING AND NOTIFICATION

- a. The Permittee shall submit to the Director all reports and notifications concerning PCB Waste activities required by this Attachment or allied permits.
- b. The Permittee shall prepare an annual document log, in accordance with 40 CFR 761.180(b), by July 1 of each year for the previous calendar year. Data from the annual document log shall be used to prepare the annual report in 12.c. of this Attachment.
- c. On or before July 15 of each year, the Permittee shall submit to the Director and to the Regional Administrator of EPA Region 8, an annual report on the amount of PCB waste received during the preceding calendar year. This report shall contain the following elements:
 - i. A summary of PCB waste amounts received and disposed by the PCB waste classification types as described in Utah Admin. Code R315-315-7 for each generator;
 - ii. The amount of any PCB waste rejected by the Permittee per generator; and
 - iii. The amount of any PCB waste spilled at the site.
- d. The results of semi-annual soil monitoring performed in accordance with Condition 11.a. shall be submitted to the Director in an annual report on or before

March 31 of the following year.

- e. The Permittee shall submit to the Director copies of the following documents for wastes containing PCBs by the 20th day of the following month in which the waste was received:
 - i. Incoming Shipment Acceptance Checklist;
 - ii. Notice to Transport, if applicable;
 - iii. Uniform Hazardous Waste Manifest, as required; and
 - iv. Low-Level Radioactive Waste Manifest.
- f. The Permittee shall submit results of the wastewater and sludge sampling described in Conditions 11.c. and 11.d. to the Director and the Regional Administrator of EPA Region 8.
 - i. The results of Condition 11.c. shall be reported within ninety (90) calendar days from the sampling event or thirty (30) calendar days from the time analytical results are received, whichever comes first.
 - ii. The results of Condition 11.d. shall be reported in an annual report on or before March 31 of the following year.

13. DECONTAMINATION

- a. All PCB decontamination activities that generate a secondary liquid waste shall be performed at the Mixed Waste Facility.
- b. PCB decontamination activities shall be performed in accordance with the requirements of 40 CFR 761.79 or by an alternative method with prior written approval from the Director.
- c. Shipping containers of PCB Bulk Product Waste (as defined in Utah Admin. Code R315-315-7) are not required to be decontaminated under 40 CFR 761.79 procedures after removal of all visible remnants of waste.
- d. Liquid or solid waste generated from decontamination activities shall be profiled in accordance with applicable requirements of Condition 6 of this Attachment or Attachment II-1-10, *Management of Waste Containing Polychlorinated Biphenyls (PCBs) at the Mixed Waste Facility*.
 - i. Disposition of the profiled waste shall be in accordance with the requirements of 40 CFR 761, and the Permittee's Radioactive Material License (UT 2300249) or this Permit.

14. SPILL RESPONSE AND PREVENTION

- a. Spill response shall be conducted in accordance with Attachment II-6, *Contingency Plan* and 40 CFR 761 Subpart G. All contaminated PPE from spill response shall be managed as part of the waste stream clean-up.

15. RETENTION OF RECORDS

- a. The Permittee shall retain waste profile records, records of all monitoring information, including all calibration and maintenance records and copies of all reports required by this Attachment, and inspection records as part of the Operating Record.

END OF ATTACHMENT II-1-10.1