

MODULE X
WASTE MANAGEMENT PLAN
FOR
POLYCHLORINATED BIPHENYLS

TABLE OF CONTENTS

X.A. OVERVIEW.....1
X.B. PCB WASTE MANAGEMENT CONDITIONS4
X.C. STORAGE OF PCBs.....5
X.D. COMPLY6
X.E. WORKER PROTECTION.....6
X.F. NON-PROCESSING SURFACE AREAS6
X.G. PCB SPILL CLEANUP6
X.H. DECONTAMINATION7
X.I. CONTINGENCY PLAN AND EMERGENCY PROCEDURES7
X.J. FACILITY INSPECTIONS9
X.K. RECORDKEEPING AND REPORTING9
X.L. CLOSURE AND FINANCIAL REQUIREMENTS11

ATTACHMENTS

Attachment X-1 PCB Training Manual
Attachment X-2 PCB Tank Management Practices
Attachment X-3 TSCA Inspection Forms
Attachment X-4 Spill Prevention Control & Countermeasure (SPCC) Plan
Attachment X-5 TSCA/PCB Coordinated Approval
Attachment X-6 Coordinated Approval B6 Expansion
Attachment X-7 Coordinated Approvals Cells B6 & 8
Attachment X-8 Original 1990 TSCA Application – Chapter 4 (Closure Plan)

X.A. OVERVIEW

Module X addresses the operating requirements specific to the drain and flush, storage, and disposal of polychlorinated biphenyls (PCBs) at the Clean Harbors Grassy Mountain Facility (CHGM). The State-issued Part B Permit and the Environmental Protection Agency (EPA) Region 8 authorizes disposal of Resource Conservation Recovery Act (RCRA) and Toxic Substances Control Act (TSCA) waste respectively in Cells B/6 and 8. Authorization for disposal in Cell Z is provided by the EPA Region 8. To provide the Director of the Division of Waste Management and Radiation Control (Director) oversight for the operations identified in the table below, the EPA issued RCRA/TSCA Coordinated Approvals (CA) pursuant to 40 C.F.R. §§ 761.77 and 761.75 that requires compliance with this module and other affected portions of the permit. Should any conflicts arise between this attachment and the other sections of this permit, the more stringent provision shall be in effect. The following table identifies the portions of the facility affected by the CA.

Affected Part of CHGM	Modules/Attachments Modified by CA
Cell B/6 and Cell 8	Module VI: Hazardous Waste Landfills Attachment II-7: Closure Plan Miscellaneous references to Cell B changed to Cell B/6 in modules
Stabilization Tanks (Tanks 122-TN-001, 002, and 003)	Module IV: Storage and Treatment in Tanks Attachment II-7: Closure Plan
Leachate Tanks (Tank 119-TN-002)	Module IV: Storage and Treatment in Tanks Attachment II-7: Closure Plan
TSCA Storage Building (and assoc. tanks and pipeline)	Module X: Waste Management Plan for PCBs Attachment II-7: Closure Plan
TSCA Tank Farm	Attachment II-7: Closure Plan
Container Management Building	Attachment II-7: Closure Plan

CHGM is authorized by this Permit and 40 C.F.R. § 761.65 (d) to commercially store PCBs and PCB items designated for disposal in accordance with this permit, issued under the authorization contained in Section 3006, RCRA. Spills of PCBs must be cleaned up in accordance with both documents.

PCBs that can be disposed of in Cell B/6 and Cell 8 consist of PCB-only waste or mixtures of PCB/RCRA hazardous waste. In addition, this Permit authorizes the disposal of RCRA-only waste streams for disposal in Cell B/6 or Cell 8.

1. TECHNICAL REQUIREMENTS

If PCBs are an Underlying Hazardous Constituent (UHC) for a RCRA waste, the concentrations for the PCBs must meet the treatment standard for PCBs prior to disposal in Cell B/6 or Cell 8. If the concentration of the PCBs as a UHC in a waste stream does not meet the treatment standard in UAC R315-268-48, CHGM shall petition the Director, and must receive the approval, for a variance from the treatment standard (UAC R315-268-44) for the waste stream prior to treating and/or disposing of it at the CHGM. A variance would not be required for trans-shipping such wastes at the facility.

PCB containers (non-bulk waste streams) can be stored in the PCB Storage Building and the Drum Dock. One bulk solid storage container can be stored in the Leachate Management Building.

2. DEFINITIONS

All the terms and abbreviations used in this Module shall have the same meanings as defined in 40 C.F.R. § 761.3 unless the context clearly indicates otherwise or unless another term is defined below, or in Module I, for the purposes of this permit and Coordinated Approval (CA).

“Application” means the following documents: a) the TSCA Commercial Storage applications submitted by Clean Harbors Grassy Mountain, LLC to the EPA to commercially store PCBs; and b) the RCRA/TSCA landfill applications submitted to the EPA for disposal of PCB wastes at RCRA/TSCA Cells B/6 and 8.

“Approval” means the Approval/Renewal document granted by the EPA, as revised.

“Division” means the Division of Waste Management and Radiation Control.

“Director” means the Director of the Division of Waste Management and Radiation Control or their representative.

“EPA” means the United States Environmental Protection Agency, Region 8 Denver office, Colorado.

“Clean Harbors Grassy Mountain, LLC.” Means the company which owns and operates a facility located at Exit 41 Off I-80, 3 Miles East and 7 Miles North of Knolls, Utah.

“PCB” means Polychlorinated Biphenyls as defined in 40 C.F.R. § 761.3.

“PCB Spill” has the same meaning as “spill,” defined in the PCB Spill Cleanup Policy in 40 C.F.R. § 761.123 and “disposal,” defined in 40 C.F.R. § 761.3.

All definitions contained in 40 C.F.R. § 761.3 (Reference also 63FR35384) § 761.123 are incorporated by reference into this attachment. Terms not defined in the regulations or in the attachment shall be defined as in Module I-FF or a

generally accepted scientific or industrial meaning or a standard dictionary meaning.

X.B. PCB WASTE MANAGEMENT CONDITIONS

1. General Conditions

CHGM shall comply with and operate in accordance with provisions of the PCB regulations (40 C.F.R. Part 761), the Permit and with the requirements of the CA.

2. Departure from Conditions

Any departure from conditions or modifications of conditions must receive prior written authorization from the Director and the EPA. Departure from these conditions without prior written approval shall subject the CA to revocation, suspension, or termination, and shall subject Grassy Mountain to an enforcement action. If CHGM becomes aware of any departure from the conditions, modification of conditions, CHGM shall notify the Director and the EPA within one business day and shall submit a written report describing the departure within five (5) business days.

3. The Right to Modify

The Director and the EPA reserve the right to add or modify conditions to the approval. The Director and the EPA may withdraw or modify this approval if there is a reason to believe that the continued operation of the storage facility presents an unreasonable risk to public health or the environment. The Director and the EPA may also modify the CA based upon new regulations or standards or due to noncompliance with conditions or the PCB regulations. CHGM shall provide upon request, any information the Director or the EPA deems necessary to determine whether cause exists for modification, revocation, suspension, or termination of the CA. Failure to provide information within five (5) business days of its request shall be deemed a violation of the conditions of the CA.

4. Responsibility

CHGM is responsible for the actions of all employees, agents, and contractors involved in its operation. Compliance with the PCB regulations, the conditions of approval, and modifications of this approval, written notifications, and the permit issued by the Director does not relieve CHGM of the responsibility to comply with all other applicable federal, state, and local laws and regulations.

5. Inspections

CHGM shall allow inspection of the site, storage facility, and records relating to the facility by authorized State or Federal employees, agents, or contractors at reasonable times to determine compliance with applicable statutes, regulations, approvals, and conditions of the CA. Any refusal by CHGM to allow access at reasonable times to the site and process, or refusal to provide copies of records shall be deemed a violation of the conditions of the CA.

6. Notification

CHGM shall notify the EPA and the Director at least thirty (30) calendar days before transferring ownership of the Facility. CHGM shall also submit to the EPA and the Director at least thirty (30) days before such transfer, a notarized affidavit, signed by the transferee, which states that the transferee will abide by all provisions of the CA. In addition, the transferee will submit a background document on their employees and past violations (like the document required of CHGM). After receiving such notification and affidavit, the Director and the EPA may issue an amended approval substituting the transferee's name for the CHGM name, or the Director and the EPA may require the transferee to apply for a new approval. The transferee shall not operate under the CA until the Director and the EPA issue an approval in the transferee's name or provides written approval to continue to operate under the existing approval until such time that the Director and the EPA issue an approval in the transferee's name.

7. Information

CHGM shall submit to the Director and the EPA upon request, any documents regarding the CHGM application, conditions, approval, or records required to be maintained by 40 C.F.R. Part 761 and this permit. Refusal to provide information shall be deemed a violation of the conditions of approval.

8. Coordinated Approval and Permit Binding

The CA and Permit is binding upon CHGM and may be revoked for any environmental civil violations including failure to comply with the requirements of the CA, Permit or criminal convictions by officers, principals, or key employees of CHGM according to the standard set forth at 40 C.F.R. § 761.65(d)(2)(vii).

X.C. STORAGE OF PCBS

CHGM shall meet the following work practice, operation, and other standards at all times during the operation of its facility. All such standards are Conditions of the CA.

1. Maximum storage capacity at any time:
 - a. PCB Tank Farm - 63,982 Gallons PCB Liquids
 - b. PCB Warehouse – PCB Waste Not in Tanks
 - i. The PCB Warehouse may store 10,670 gallons of waste PCB items (e.g., transformers, circuit breakers, voltage regulators, switches, bushings, small PCB capacitors, light ballasts, PCB Articles, PCB Article Containers, etc.), debris, PCB Containers, large PCB capacitors, PCB liquids, etc.
 - ii. Of the permitted 10,670 gallons, the maximum quantity of PCB Large Capacitors is 3,575 gallons.
 - iii. Of the permitted 10,670 gallons, the maximum quantity of PCB

Liquids is 8,190 gallons minus the volume of PCB Large Capacitors in storage at the same time.

- c. PCB Warehouse - PCB Liquid Waste in Tanks - 6,000 gallons.
- d. PCBs in containers shall be managed in accordance with Attachment X-3, PCB Commercial Storage Approval Training Manual. PCBs in tanks shall be managed in accordance with Attachment X-5, PCB Tank Management Practices.

X.D. COMPLY

CHGM shall comply with all PCB regulations under 40 C.F.R. Part 761, including:

1. Containment, berm dimensions, containers, and maximum volume as described in the application and clarified in the approval.
2. PCB markings and other labeling as required by the permit.
3. D.3 Access restrictions to storage areas.
4. Shipping documentation and tracking for chain-of-custody requirements within the storage site.

X.E. WORKER PROTECTION

1. CHGM shall comply with the Safety and Hygiene provisions of the approved application.
2. CHGM shall develop and submit to the Director and the EPA a training plan for workers in the form of a training manual See X-3 PCB Storage Approval Training. The Director and the EPA shall have the right to review the training plan and require correction of deficiencies identified. Within sixty (60) days of the approval date or modification date, CHGM shall train employees as specified in the training manual. New employees shall be trained as specified in the manual prior to entering the storage areas. The manual shall address the regulatory requirements of 40 C.F.R. Part 761 with emphasis on the requirements of the PCB Spill Cleanup Policy (40 C.F.R. Part 761, Subpart G). The training plan shall include specifics of the Safety Plan, Contingency Plan, and Emergency Procedures as well as the Spill Prevention Control and Countermeasure (SPCC) Plan. CHGM will document all required training in the employee's training record. A signature sheet or an electronic certification may be used to verify personnel participation.

X.F. NON-PROCESSING SURFACE AREAS

Non-processing surface areas of the facility shall not exceed those allowed in 40 C.F.R. Part 761, Subpart G.

X.G. PCB SPILL CLEANUP

Cleanup of PCB spills shall be in accordance with 40 C.F.R. Part 761, Subpart G.

X.H. DECONTAMINATION

In the unlikely event that PCB contamination exceeds the limits set forth at 40 C.F.R. Part 761, Subpart G, CHGM shall decontaminate the affected area in accordance with the PCB regulations (40 C.F.R. § 761.125). CHGM shall not encapsulate any PCB contaminated areas resulting from spills regardless of PCB concentration levels without prior written approval from the Director and the EPA.

X.I. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

1. CHGM shall follow the facility SPCC Plan and the Contingency Plan (Attachment II-6) when there is a fire, explosion or release of PCBs or hazardous constituents.
2. A copy of the Contingency Plan and revisions shall be maintained at the CHGM site. A copy of the Training Manual (Attachment X-3), SPCC Plan, and the current CA shall also be maintained on-site. Lists of emergency contacts and telephone numbers shall be posted in the PCB Commercial Storage Facility.
3. CHGM shall inspect, test, and maintain emergency equipment as recommended by the manufacturer or in accordance with other regulatory agency requirements for safety equipment to ensure its proper operation in times of emergency. Equipment manufactured by CHGM shall follow a testing and maintenance plan for those manufactured items established by CHGM. At a minimum, the facility shall be equipped with the following emergency equipment:
 - a. An internal communications or alarm system capable of providing immediate emergency notification (voice or signal) to facility personnel.
 - b. Devices, such as a telephone or two-way radio, which is immediately available at the scene of operations, capable of summoning emergency assistance from other site personnel and to direct others to contact local police departments, fire departments, and State or local emergency response teams.
 - c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment at the PCB Commercial Storage Facility.
 - d. Water at adequate volume and pressure to supply fire hose streams or foam equipment to the PCB Commercial Storage Facility.
4. When PCBs are being poured, mixed, or otherwise handled, CHGM shall ensure all personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee.
5. At all times, there shall be at least one (1) employee, either present at CHGM or on call, with the responsibility for coordinating all emergency response measures. This employee shall have immediate access to the entire facility and to a device such as a telephone immediately available that is capable of summoning external emergency assistance. This employee must have the authority to commit resources needed to carry out the Contingency Plan.
6. Adequate aisle space shall be maintained to allow for unobstructed access by

personnel, fire protection equipment, and decontamination equipment to all PCB items stored on-site.

7. All emergency equipment inspection and maintenance records must be maintained at the facility for three years and made available upon request.
8. Within thirty days of modification, CHGM shall provide copies of the Contingency Plan and Emergency Procedures to all local police departments, fire departments, and state and local emergency response teams that may be called upon to provide emergency services.
9. In the event an authorized operator of CHGM believes, or has reason to believe, that any detectable quantities of PCBs have been released to the environment due to storage, handling, or other activity, the activity shall be terminated immediately. The operator shall report the release in accordance with CHGM procedures and spill clean-up shall begin immediately. CHGM shall report the release in accordance with all applicable federal, state, and local reporting requirements.
10. CHGM shall immediately report to the Director and the EPA if unauthorized entry occurred at CHGM which caused PCBs to be discharged, the nature of any problem that may have resulted from this unauthorized entry and corrective actions taken by the facility to prevent a recurrence. Problems to be reported shall include, but not be limited to, any tampering, destruction, or loss that caused the release of PCBs.
11. CHGM shall review and amend the SPCC, and/or Contingency Plan, and Emergency Procedures whenever:
 - a. Either plan fails in an emergency.
 - b. CHGM changes its design, construction, operation, maintenance, or other circumstances that materially increases the potential for fires, explosions, or releases of PCBs or hazardous constituents, changes to emergency response policies or practices.
 - c. When a revision is warranted to prevent a risk of injury to health and the environment.
 - d. When the Director or the EPA determines that a plan revision is necessary.
12. CHGM is a Tier I qualified facility as defined in 40 CFR 112.3(g). As such CHGM may review and sign the SPCC plan. CHGM shall review the SPCC plan every five (5) years. CHGM shall implement any amendment as soon as possible, but not later than six months following the preparation of any amendment. Documentation of the five (5) year review shall be in the form of a statement as to whether the plan was amended or in a log or an appendix to the Plan. The following words will suffice, "I have completed the review and evaluation of the SPCC Plan for the Clean Harbors Grassy Mountain Facility on (date) and will (will not) amend the Plan as a result."

X.J. FACILITY INSPECTIONS

CHGM shall inspect the PCB management facilities in accordance with the requirements of Attachment X-6, which include the PCB (TSCA) inspection forms. The following inspection procedures shall be followed:

1. The inspector will complete all the appropriate blanks on the form (e.g., date, time, etc.).
2. The inspector will print and sign their name if using a hardcopy format. Inspectors will be identified by computer user login identifications if using electronic forms.
3. Inspectors will conduct inspections at the frequency listed on the inspection forms.
4. If the inspection item is “OK,” the inspector will indicate it by marking the appropriate column.
5. If the inspection item is “NOT OK,” the inspector will indicate it by marking the appropriate column and describing the problem in the adjacent column. For electronic inspections, the inspector will select the appropriate reason for failure and include any necessary comments. A Workticket will be automatically created by the WINWeb System.
6. When a Workticket failure is resolved, the inspector will describe the solution in the Note section and close the Workticket in WINWeb.
7. Inspection records shall be maintained by CHGM and be made available upon request.

X.K. RECORDKEEPING AND REPORTING

1. CHGM shall comply with all recordkeeping requirements outlined in the PCB regulations, 40 C.F.R. Part 761.
2. CHGM shall maintain an inventory of all PCBs and PCB items received and/or transferred. CHGM shall provide copies of inventories of PCBs and PCB items currently in storage to an authorized representative of the Director and the EPA within 24 hours of the request.
3. All PCB records, documents, and reports shall be maintained at the CHGM and shall be made available for inspection by authorized Director and EPA representatives. When CHGM ceases operations, all records, documents, and reports or certified copies thereof, shall be made available to the Director and the EPA at the facility for a period of at least three (3) years following cessation of operations. If CHGM is unable to comply with this condition because it is no longer in control of the site, it shall comply by making the records, documents, and reports available at an alternative location proposed by CHGM and acceptable to the Director and the EPA.
4. All handwritten records required by 40 C.F.R. § 761.180 and the approval shall be written in ink or typed. Photocopies, facsimiles, and electronic files or printouts

are also acceptable. Any modification or correction of the records must be initialed and dated by the person making the correction. CHGM shall report any significant discrepancy to the Director or the EPA within the time frame required by 40 C.F.R. § 761.210.

5. All records, documentation, and information relating to sampling, analysis, and quality assurance as required by the approval shall be retained at the facility or an alternative location acceptable to the Director and EPA, for a minimum of three (3) years following cessation of operation, or longer if requested by the Director or the EPA. The records, documentation, and information shall include the following:
 - a. Exact date, place, and time of each sample collected.
 - b. Volume of each sample collected.
 - c. Name of person collecting each sample.
 - d. Name of analyst.
 - e. Date and time of analysis.
 - f. Analytical techniques or methods used for each sample.
 - g. Analytical results.
 - h. Records of Quality Assurance activities.
6. At the completion of a cleanup required by Section X.G (PCB cleanup) of this module, CHGM shall develop and maintain records of the cleanup, including at a minimum.
 - a. Identification of the source of the contamination.
 - b. Date and time contamination was discovered.
 - c. Date and time cleanup was completed.
 - d. Brief description of the contaminated area.
 - e. Pre-cleanup and post-cleanup sampling data, if required by 40 C.F.R. Part 761, Subpart G, used to define boundaries of contamination and a brief description of the methodology used to establish contaminated boundaries.
 - f. Amount of waste cleanup material generated.
 - g. Certification statement signed by CHGM stating that the decontamination levels referenced in 40 C.F.R. Part 761, Subpart G have been achieved and that the information contained in the record is true to the best of his knowledge.
7. CHGM shall maintain manifest copies and Certificates of Disposal for all PCBs and PCB items stored at CHGM. Copies of Certificates of Disposal shall be provided to the generator within thirty (30) days of receipt by CHGM of documentation of final disposal of all materials resulting from the commercial storage of PCBs and PCB items.

X.L. CLOSURE AND FINANCIAL REQUIREMENTS

1. CHGM shall comply with the current closure plan and closure cost estimate submitted as part of the application process and approved by the Director and the EPA. The closure plan shall be modified as required by UAC R315-264-112(c).
2. CHGM shall notify the Director and the EPA at least 90 days prior to the date it expects to begin closure. The closure plan shall meet the requirements of 40 C.F.R. Part 761. Upon termination of operations, the provisions of the closure plan shall be followed. The termination of operations includes cessation of operations required by expiration, termination, or revocation of this approval.
3. Financial assurance for closure shall meet the requirements of 40 C.F.R. § 761.6,5(g) and UAC R315-264. CHGM shall submit documentation of continued financial assurance with annual cost estimate adjustments for inflation to the Director and the EPA. The closure cost estimate shall be based on maximum inventory conditions.
4. The closure plan shall be amended when changes in operating plans or facility design affect the terms of the closure plan and submit to the Director and the EPA at least thirty (30) days prior to the modification.