UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 11 1994



Ricky J. Keeling
Martin Marietta Energy Systems, Inc.
P.O. Box 2003
Oak Ridge, Tennessee 37831

Dear Mr. Keeling:

This is in response to your letter of February 21, 1994, in which you request guidance concerning the classification of a "Cincinnati" machine tool and insulated electric cable and wiring as excluded PCB products pursuant to the PCB regulations at 40 CFR 761.3. In addition, you request general guidance on classifying items as excluded PCB products.

The enclosed letter to John Mearman dated December 9, 1992, provides general guidance on what items qualify as excluded PCB products. EPA has not developed a specific guidance document on excluded PCB products but additional clarifications may be obtained by talking to your Regional PCB Coordinator. Once an item has been determined to be an excluded PCB product (i.e., it is less than 50 ppm PCB and the caveats in the definition are met), an authorization is not needed in order for the item to be processed, distributed in commerce, or used (see 40 CFR 761.1(f)(4) and 761.20).

The first item you seek guidance on is a "Cincinnati" machine tool, presumably an old machine lathe. PCB analysis results from the oil reservoir in the machine ranged from 6 to 7 ppm of Arochlor 1260 and the results of surface wipe samples ranged from 1.2 to 28 micrograms PCBs per 100 square centimeters. In addition, you found no information to indicate that the machine had used PCBs at 50 ppm or greater in the past. Your management plan is to drain the oil from the machine and dispose of the drained machine in a smelter.

This machine tool does not qualify as an excluded PCB product because the results of the surface wipe samples show PCBs in excess of 10 micrograms per 100 square centimeters (10 micrograms per 100 square centimeters is the regulatory equivalent to 50 ppm for surfaces). The fact that the machine does not meet the definition of an excluded PCB product does not, however, preclude you from following through with your management

| CONCURRENCES | | | | | | | |
|---|---|---|---|---|---|---|---|
| SYMBOL | 7404 | 7404 | 7404 | | | | |
| SURNAME | SIMONS | Reviewed | Foy | | | | |
| DATE | 3/11/94 | 3/11/94 | 3/11/94 | | | | |

plan to dispose of the machine at a smelter and incinerate the drained oil. If your plan was to sell the machine for use or use the machine yourself, the contaminated surface areas would have had to have been decontaminated to below 10 micrograms per 100 square centimeters prior to such reuse.

The second item in question is electrical wire and cable with insulation that contains less than 50 ppm; specifically no greater than 8.5 ppm PCB in the insulation of one type of cable. From the description in your letter, it is difficult to know whether your sampling of electrical cable is representative of the cable in the building to be demolished. The non-metal portion of similar cable from U.S. Navy submarines has been found to have an aggregate PCB concentration of over fifty parts per million. However, when the aggregated non-metal fraction of the submarine cable was pulverized and subjected to the TCLP analysis, extractable PCBs were less than 50 micrograms per liter. In order for EPA to evaluate whether the wire contains PCBs regulated for disposal, more information is needed. Currently, there is no method in the PCB regulations or PCB program interpretive policy for sampling or characterizing the PCB concentration of electrical cable for determining whether it is an excluded PCB product. If such an interpretive policy were to be developed, information would be required on the kinds of wire to be disposed, the estimated amount of each kind of wire, and a characterization of the PCB concentration for each kind of wire. However, no characterization would be needed to smelt the wire or to dispose of the wire in a PCB chemical waste landfill. The Regional Administrator for EPA's Region IV may be willing to approve characterization procedures for determining the regulatory status of this material, with respect to disposal, as part of a disposal approval or enforcement agreement.

If you have any further questions or comments, you may contact Tom Simons (202-260-3991) or John Smith (202-260-3964) of my staff.

Sincerely,

Tony Baney, Chief
Operations Branch

Enclosure

cc: Stuart Perry, Region IV