UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

03/21/2023

OFFICE OF
LAND AND EMERGENCY
MANAGEMENT

Mr. Robert J. Ferguson
Project Manager / Sr. Hydrogeologist
NY Metro Long Island Operations
Miller Environmental Group
538 Edwards Avenue
Calverton, New York, 11933

Dear Mr. Ferguson:

The Office of Resource Conservation and Recovery (ORCR) of the U.S. Environmental Protection Agency (EPA) grants renewed approval to Enviro Jet Technologies (Enviro Jet) to operate its Mobile Decontamination Units' (MDUs) spraying and soaking tank process using Enviro Clean (which is a performance-based organic decontamination solvent) to decontaminate natural gas pipeline and other non-porous metal surfaces contaminated with polychlorinated biphenyls (PCBs), subject to the terms and conditions specified in the enclosed Approval. EPA also grants renewed approval to Enviro Jet to reuse Enviro Clean and to use alternate sampling site location procedures when following the measurement-based decontamination process on natural gas pipeline and other non-porous metal surfaces contaminated with PCBs, subject to the terms and conditions specified in the enclosed Approval. This Approval is issued pursuant to Section 6(e)(1) of the Toxic Substances Control Act (TSCA) and 40 CFR § 761.79(h) of the federal PCB regulations. This Approval is applicable on a nationwide basis, because Enviro Jet's process is mobile and could potentially operate in any state. This Approval is effective upon EPA's signature and, unless specified otherwise in Condition 21, expires five (5) years after the date of signature.

Enviro Jet conducted decontamination demonstrations in 2001, 2005, 2013, and 2022 to confirm performance of its decontamination methods. EPA representatives observed the demonstrations and collected wipe samples before and after the decontamination. Results of the analysis from the demonstrations, which are summarized in Appendix IV of the enclosed Approval, indicate that Enviro Jet's spraying and soaking decontamination methods using Enviro Clean have the ability to reduce PCBs at a surface concentration of $\leq$ 5000 µg/100 cm^2 to levels $\leq$ 10 µg/100 cm^2. This level of decontamination was used as a measure of success for the demonstration, as it is the level identified for non-porous surfaces in § 761.79(b)(3)(i)(A) for unrestricted use. In addition to the demonstrations, Enviro Jet conducted a validation study for their decontamination solvent, Enviro Clean, in accordance with 40 CFR part 761, subpart T "Comparison Study for Validating a New Performance-Based Decontamination Solvent Under § 761.79 (d)(4)." The Agency finds that the use of Enviro Jet's decontamination procedures, when operated in accordance with the applicable PCB regulations and in accordance with the terms and conditions of this Approval, poses no unreasonable risk of injury to health or the environment.

This Approval also allows Enviro Jet to use alternate sampling site location procedures other than those required under § 761.79(f), when following the measurement-based decontamination process under § 761.79(b), which requires confirmatory sampling. Enviro Jet may use 40 CFR part 761, subpart M instead of subpart P for this confirmatory sampling on natural gas pipeline, pursuant to § 761.79(h)(3). While subpart P will generally require more samples than subpart M, subpart M was designed with knowledge of the shape and use of natural gas pipeline to target the bottom of the pipe where PCBs are most likely to settle. Therefore, selecting sampling locations pursuant to subpart M will reliably determine the PCB concentration of natural gas pipelines, and determine whether the decontamination standard specified in § 761.79(b)(3)(i)(A) has been met. EPA finds that use of subpart M for sampling pipeline poses no unreasonable risk of injury to health or the environment when used in accordance with the enclosed Approval.

EPA previously approved Enviro Jet Technologies for similar use of decontamination procedures in an Approval issued on July 6, 2017. Enviro Jet submitted its application for renewal to EPA on January 4, 2022. EPA is granting this renewed Approval based upon the Agency's finding that Enviro Jet's spray and soaking processes perform as well as the decontamination procedures in § 761.79(c) and pose no unreasonable risk of injury to health or the environment. EPA also finds it acceptable to allow Enviro Jet to filter and reuse Enviro Clean after use instead of disposing of it, as long as the PCB concentration before reuse is < 2 ppm, which is the concentration set out in § 761.79(c)(3)(iii) and this Enviro Clean concentration is not the result of dilution.

Enviro Jet must comply with all applicable terms and conditions of the Approval and all other applicable provisions in part 761, including § 761.79. A violation of any condition of this Approval or any applicable federal regulations may subject Enviro Jet to enforcement action and may be grounds for modification, revocation, or suspension of this Approval. Modification, revocation, or suspension of this Approval may also result from future EPA rulemaking(s) with respect to PCBs, or from new information gathered by Enviro Jet and/or EPA.

Please contact Nadja Solis Marcano of my staff by email at solismarcano.nadja@epa.gov, or by phone at (202) 566-0356 if you have any questions pertaining to this Approval.

Sincerely,

Digitally signed by
SONYA SASSEVILLE
Date: 2023.03.21
11:27:08 -04'00'

Sonya M. Sasseville, Director
Program Implementation and Information Division
Office of Resource Conservation and Recovery

Enclosure

cc: EPA Regional PCB Coordinators

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

	)	
	)	APPROVAL TO USE
IN THE MATTER OF	)	
	)	ALTERNATE DECONTAMINATION
ENVIRO JET TECHNOLOGIES	)	
	)	METHOD AND SAMPLING SITE
538 EDWARDS AVENUE	)	
	)	SELECTION FOR POLYCHLORINATED
CALVERTON, NY 11933	)	
	)	BIPHENYLS (PCBs)

AUTHORITY

This Approval is issued pursuant to Section 6(e)(1) of the Toxic Substances Control Act (TSCA) and 40 CFR § 761.79(h) of the federal polychlorinated biphenyls (PCB) regulations.

Failure to comply with the Approval conditions specified herein shall constitute a violation of §§ 761.79(h) and 761.50(a) and may also be a violation of other provisions of the PCB regulations in part 761. A violation of the PCB regulations is a prohibited act under section 15 of TSCA.

SUMMARY AND FINDINGS

Background information, process descriptions, demonstration test result summaries, and a sample 30-day advanced notification of operations form are included in Appendices I through V.

Enviro Jet Technologies (Enviro Jet), a division of Miller Environmental Group, Inc., of Calverton, New York, has a proprietary system for pipeline decontamination service for natural gas, electric, and petrochemical industries. EPA finds that Enviro Jet's process performs as well as the decontamination procedures in § 761.79(c) for natural gas pipeline and other non-porous metal surfaces. In addition, EPA finds that when Enviro Jet follows § 761.79(b) and uses the sampling site selection procedures in part 761, subpart M pursuant to this Approval, it is equivalent to subpart P prescribed in § 761.79(f), for reliably determining PCB concentrations in natural gas pipelines. Further, EPA finds that Enviro Jet's process and sampling methods, when conducted in accordance with this Approval, will not pose an unreasonable risk of injury to health or the environment.

EFFECTIVE DATE

This Approval is effective upon signature by the Director of the Program Implementation and Information Division (PIID) and shall expire five (5) years after the date of signature, unless otherwise specified in Condition 21.

CONTENTS

DEFINITIONS AND ACRONYMS

Definitions found in 40 CFR 761.3 apply unless otherwise noted below.

"Analytical data" means: (a) a formal report from a chemical analysis laboratory; or (b) appropriate chemical instrument print outs from a chemical instrument that have appropriate controls, standards, and written instrumental operating parameters and conditions. Technical judgment or experience is not considered analytical data.

"Application" means all data and materials upon which EPA based its decision to approve Enviro Jet's process and sampling methods, (e.g., information submitted to EPA by Enviro Jet to define, represent, or describe Enviro Jet's decontamination methods, decontamination solvent, or sampling methods). This includes the request for Approval renewal required by § 761.79(h) and such data and materials submitted in relation to both the demonstrations and operating Approval applications, as well as Enviro Jet's "2022 EJT Permit Renewal - Rev" application, dated January 4, 2022.

"Approval" means the content of this document, the conditions within, and the application.

"Calendar year" or "year" means any 365 consecutive days except in the occurrence of a leap year, which contains 366 days. The calendar year does not necessarily begin on January 1st.

"CFR" means the Code of Federal Regulations.

"Day(s)" means a calendar day(s), unless otherwise specified.

"Decontaminate" or "Decontamination" means any removal of PCBs from natural gas pipeline and other non-porous metal surfaces.

"Director of PIID" means the Director of the Program Implementation and Information Division (PIID), Office of Resource Conservation and Recovery (ORCR), Office of Land and Emergency Management (OLEM), U.S. EPA, Washington, DC. Mailing address: USEPA Headquarters, 1200 Pennsylvania Avenue, N.W., OLEM/ORCR/PIID, Mail Code: 5303T, Washington, DC 20460. Phone number: (202) 566-1077. Email: ORCRPCBs@epa.gov.

“Enviro Clean” means Enviro Jet’s brand of decontamination solvent, which is a minimum 10% by volume solution of terpene hydrocarbons in water, which must contain < 2 ppm PCBs to be used for decontamination.

“Enviro Jet’s process” means Enviro Jet’s Mobile Decontamination Unit (MDU) spraying method and/or soaking tank method of decontaminating natural gas pipeline and other non-porous metal surfaces contaminated with PCBs, using Enviro Clean.

"Facility" means all contiguous land and structures (such as a single manufacturing plant) at which Enviro Jet conducts decontamination work.

"Facility location" means a street address or a directional description which would allow a facility to be found by an EPA inspector, as opposed to a P.O. box that is not indicative of the location where Enviro Jet conducts decontamination work.

“HQ” means EPA Headquarters.

“Job” means all of Enviro Jet’s operations for a single customer within fifty road miles of a central location. A job may consist of Enviro Jet’s operations at several different facilities for a single customer.

"Lost-time injury" or "lost workday injury" means an injury related to Enviro Jet’s operations, which results in an employee not performing their normal assignments during the workday and/or any successive workday following the day of injury.

"Major modification" means any change to capacity, design, operations, or any other changes significantly affecting, or having the potential to significantly affect, overall PCB decontamination efficiency, performance, or environmental impact of Enviro Jet’s process.

“Mobile Decontamination Unit” or MDU, means one of the two Enviro Jet decontamination systems which are fitted within a truck for ease of mobility and are designed to decontaminate natural gas pipeline contaminated with PCBs by way of high pressure spraying with Enviro Clean (a 10% terpene hydrocarbon decontamination solvent).

"Mobile operations" means those operations where Enviro Jet operates at a facility for less than 60 total cumulative days in any calendar year. Cumulative days do not have to be consecutive to count towards the 60 days. The 60 cumulative day compilation starts on the first day any component of Enviro Jet’s MDUs or soaking tank begins operating at the facility.

“MODEF” means mineral oil dielectric fluid.

“Natural Gas Pipeline” means natural gas piping between six and twenty-four-inch nominal diameter constructed from metallic materials.

"Operations" means Enviro Jet’s process of decontaminating natural gas pipeline and other non-porous metal surfaces contaminated with PCBs and sending PCB-contaminated materials off site for disposal, including set-up and take-down of the procedure and actual decontamination.

"ORCR" means the Office of Resource Conservation and Recovery, located at EPA Headquarters.

"PCB" means polychlorinated biphenyls as defined in § 761.3.

“PCB Regulations” are the regulations at 40 CFR part 761.

“PIID” means the Program Implementation and Information Division of the Office of Resource Conservation and Recovery, within EPA Headquarters.

"Permanent operations" means those operations where Enviro Jet operates at a facility for 60 total cumulative days or longer in the same year. The 60 cumulative day compilation starts on the first day Enviro Jet begins operating at the facility. Cumulative days do not have to be consecutive to count towards the 60 days.

“PODF” means performance-based organic decontamination fluid as defined in § 761.3.

“Regional PCB Coordinator” means the contact listed on the following website for the EPA Region in which the unit is or will be operating: https://www.epa.gov/pcbs/program-contacts.

“Sampling Methods” means the procedures for determining the sampling site locations for determining PCB surface concentrations, using 40 CFR part 761, subpart M.

"Site" has the same definition as “Facility.”

“Spill” has the same meaning as the term defined in EPA's PCB Spill Cleanup Policy in § 761.123.

CONDITIONS OF APPROVAL

(1) Scope of Approval

In accordance with § 761.79(h), this Approval waives specified applicable requirements of §§ 761.79(b) and 761.79(c) as provided herein. This alternative decontamination and sampling Approval may reference additional requirements of part 761 but Enviro Jet should not rely solely on this Approval for all requirements related to PCBs or the disposal of PCB waste. In the event that the information contained in the application or other supporting documents differs from the conditions specified in this Approval, the conditions of this Approval shall govern.

Enviro Jet decontaminates natural gas pipelines using two different approaches: (1) self-implementing under § 761.79(c); and (2) measurement-based under § 761.79(b). Under the alternative approval provisions of § 761.79(h), EPA is approving certain variations from the prescribed procedures for these approaches as provided below:

a. Enviro Jet shall comply with the provisions of § 761.79, except as otherwise indicated in this Approval.

b. This Approval does not permit Enviro Jet to modify any additional requirements under § 761.79 in any other respect.

c. Self-Implementing Approach:

1) This Approval authorizes Enviro Jet to decontaminate natural gas pipeline (a non-porous surface) in contact with PCBs using the MDU's high pressure spray, as an alternative to soaking which is specified under § 761.79(c)(3)(iii).

2) This Approval authorizes Enviro Jet to decontaminate non-porous metal surfaces by using a tank to soak the materials for a minimum of 2 hours, as an alternative to soaking for 15 hours which is specified under § 761.79(c)(3)(iii).

3) This Approval authorizes Enviro Jet to use Enviro Clean when performing its spraying or soaking process, instead of a 100% terpene hydrocarbon PODF, which is specified under § 761.79(c)(3)(iv).

4) This Approval authorizes Enviro Jet to filter and reuse Enviro Clean after each job, as an alternative to disposing of the solvent which is specified under § 761.79(c)(3)(vi), only if the resulting concentration of Enviro Clean is < 2 ppm PCBs which is the concentration set out in § 761.79(c)(3)(iii) and this Enviro Clean concentration is not the result of dilution.

d. Measurement-Based Approach:

1) This Approval authorizes Enviro Jet to use the following sampling site location procedures as an alternative to those specified under § 761.79(f), when following the measurement-based decontamination process under § 761.79(b), which requires

confirmatory sampling: Enviro Jet may use part 761, subpart M instead of subpart P for this confirmatory sampling on natural gas pipeline. The PCB surface concentration must be verified as measured by a standard wipe test (as defined in § 761.123) at locations selected in accordance with part 761, subpart M and this Approval.

(2) Operating Conditions for Self-Implementing Approach

Operation of Enviro Jet's MDU spraying and soaking procedures to decontaminate natural gas pipeline and other non-porous metal surfaces contaminated with PCBs shall be subject to the conditions of this Approval and shall be consistent with the information included in Enviro Jet's application dated January 4, 2022.

Enviro Jet may decontaminate natural gas pipeline and other non-porous metal surfaces under the following scenarios:

a. Enviro Jet may use the MDUs' high-pressure spray on natural gas pipeline only. When using the MDUs' high-pressure spray on natural gas pipeline:

1) Enviro Jet shall only conduct PCB decontamination operations, under the conditions of this Approval, with the following Mobile Decontamination Units:

Name of the Unit	Vehicle Identification Number (VIN)
MEG #503	1FV6HJBA2YHF28853
MEG #505	2NKMHD7XX4M397826

2) Enviro Jet shall operate the MDU equipment in accordance with the operating parameters indicated in their application (e.g., pump is operating between 1,500 and 2,000 pounds per square inch (psi)).

3) Enviro Jet shall use a minimum of three (3) wash cycles if the natural gas pipeline does not have scale, grit, oil, or other particles on the internal surface. When scale, grit, oil, and/or other particles are present, then Enviro Jet shall use a minimum of five (5) cycles to ensure complete decontamination.

4) To determine whether three (3) or five (5) cycles are required, Enviro Jet shall monitor the filter on the MDUs. If the filter exceeds 15 psi of pressure at any time during the three (3) cycles, it means significant sediment is present and Enviro Jet shall use a minimum of five (5) cycles.

5) Before each job, Enviro Jet shall conduct a visual inspection of the MDU and record findings on a project check list.

6) Enviro Jet shall install spill prevention controls, including: watertight Pipe Entry Devices (PEDs), 3-mil liner for the access pits, and large drip pans under PEDs.

7) Enviro Jet is authorized to use the MDUs' high-pressure spraying technology on natural gas pipeline with PCB surface concentrations ≤ 5000 µg/100 cm^2 without doing final standard wipe test (as defined in § 761.123) when using this self-implementing approach. However, if the pipeline surface concentration exceeds 5000 µg/100 cm^2, a final wipe test is required following the specifications on § 761.79(b).

8) Enviro Jet shall not decontaminate more than 500 feet of pipeline at once.

9) All MDUs covered by this Approval shall be identified by the ID number assigned by Enviro Jet along with its corresponding trailer Vehicle Identification Number (VIN) and Department of Motor Vehicle (DMV) license plate, as identified in the application.

10) Afer each job, Enviro Jet shall sample the Enviro Clean solution, and if the concentration of PCBs is significantly elevated (i.e., > or = 10 ppm), Enviro Jet shall repeat the spraying process for that job with clean solution.

b. Enviro Jet may use their 30 and 10-yard soaking tanks on natural gas pipeline and other non-porous metal surfaces. When using the soaking tank:

1) Enviro Jet shall conduct the soaking process using Enviro Clean in accordance with the operating parameters indicated in their application (e.g., temperature between 39°F and 99°F).

2) Before each job, Enviro Jet shall conduct a visual inspection of the soaking tank and record findings on a project check list.

3) Enviro Jet shall completely submerge the natural gas pipeline or other non-porous metal surface in the soaking tank filled with Enviro Clean.

4) Enviro Jet is authorized to soak natural gas pipeline and other non-porous metal surfaces with PCB surface concentrations ≤ 5000 µg/100 cm^2 for no less than two (2) hours, without a standard wipe test (as defined in § 761.123) when using this self-implementing approach. If the initial pipeline surface concentration exceeds 5000 µg/100 cm^2, a final wipe test is required following the specifications on § 761.79(b).

5) After each job, Enviro Jet shall sample the Enviro Clean solution, and if the concentration of PCBs is significantly elevated (i.e., > or =10 ppm), Enviro Jet shall repeat the soaking process for that job with clean solution.

c. Enviro Jet may only use Enviro Clean at concentrations < 2 ppm PCBs for either soaking or spraying for decontamination purposes. Enviro Jet may filter, and reuse used Enviro Clean solution if the filtered concentration is < 2 ppm PCBs and this Enviro Clean concentration is not the result of dilution. Enviro Jet shall dispose of used solvent, filter, and any other decontamination waste and residues generated in accordance with § 761.79(g). Enviro Jet may transport liquids at concentrations containing ≥ 2 ppm PCBs from one site to another, so long as they are transported and stored in U.S. Department of Transportation (USDOT) approved containers or tanks.

(3) Sampling Requirements for Measurement-Based Approach

When following the measurement-based decontamination process under § 761.79(b), this Approval authorizes Enviro Jet to use alternative sampling site selection procedures for post-decontamination sampling as specified below:

a. Enviro Jet may use the sample site selection procedures as specified in part 761, subpart M to determine the sampling locations for natural gas pipelines.

b. Wipe samples shall be chemically analyzed pursuant to § 761.314.

(4) Natural Gas Pipeline and Other Non-Porous Metal Surfaces with Final Wipe Sample Concentrations Above the Decontamination Standard

When using the measurement-based decontamination process under § 761.79(b), if Enviro Jet fails to achieve the decontamination standard for unrestricted use of non-porous surfaces in contact with liquid PCBs (i.e., $\leq$ 10 µg/100 cm^2), Enviro Jet shall either repeat the decontamination process until the natural gas pipeline or other non-porous metal surface has a surface concentration of $\leq$ 10 µg/100 cm^2, or store, abandon, or dispose of the natural gas pipeline or other non-porous metal surface in accordance with §§ 761.65 and 761.60(b)(5). If the natural gas pipeline or other non-porous metal surface has not been adequately decontaminated to a surface concentration $\leq$ 10 µg/100 cm^2 after repeating the decontamination process three (3) times, Enviro Jet shall cease operations and such natural gas pipeline or other non-porous metal surface shall be stored and/or disposed of in accordance with §§ 761.65 and 761.60(b)(5) as if it contained PCBs at the level of the original wipe sample before Enviro Jet attempted the decontamination. Enviro Jet must notify the Director of PIID as well as the EPA Regional PCB Coordinator as identified in Condition 12 within three (3) business days of failure to decontaminate the natural gas pipeline or other non-porous metal via email, and file with each of them a written report within seven (7) days.

(5) Unit Damage

Enviro Jet shall report any damage to the MDU(s) or soaking tank(s) that may impact the unit's ability to operate in accordance with this Approval within two (2) business days by email or by phone to the PCB Regional Coordinator and the ORCR Headquarters contact identified in Condition 12. Within five (5) business days, Enviro Jet shall submit a written report that addresses such damage to the Director of PIID and the PCB Regional Coordinator. The written report shall include information on the incident causing the damage, the cause(s) of the incident, steps being taken to repair the unit, and the estimated time before the unit is able to perform as specified in this Approval. Enviro Jet shall notify the PCB Regional Coordinator and the ORCR Headquarters contact identified in Condition 12 by email or by phone and receive Approval from PIID via written or emailed correspondence before resuming operations. EPA may require a performance demonstration or submittal of appropriate data and/or information before Enviro Jet may resume operations to confirm that the unit has been fully repaired.

(6) Generated Waste Disposal and Handling Requirements

a. Enviro Jet shall sample and analyze any Enviro Clean used by Enviro Jet's MDUs and/or soaking tank after each use. Enviro Jet shall either filter and reuse the Enviro Clean if it is < 2 ppm and is not the result of dilution or dispose of the solvent in accordance with § 761.79(g). Liquids at concentrations containing ≥ 2 ppm PCBs may be transported from one site to another, so long as they are transported and stored in U.S. Department of Transportation (USDOT) approved containers or tanks.

b. Enviro Jet shall dispose of the filter, 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, in accordance with § 761.79(g)(6).

c. Enviro Jet shall comply with the labeling and marking requirements for PCB containers under §§ 761.40 and 761.45 for the MDU(s) and soaking tanks.

(7) Monitoring and Recordkeeping Requirements

a. During the decontamination conducted under this Approval, Enviro Jet shall monitor, record, and maintain, electronically and/or in a hard copy at their main office in Calverton, NY, or another secure location, the following operating parameters and information:

1) Length and size of natural gas pipeline and other non-porous metal surfaces decontaminated for each facility;

2) The estimated quantity and PCB concentration of decontamination solvent used for each job;

3) The estimated size and length of pipeline treated during the decontamination job;

4) Any parameters measured during the spraying procedure, including but not limited to: jetting pressure, flow rate, and hose reel speed;

5) For the spraying procedure, the filter pressure recorded and whether three (3) or five (5) cycles were performed;

6) A copy of the gas chromatogram to determine the final concentration of decontamination solvent or wastewater not sent for disposal;

7) A copy of the gas chromatogram from wipe samples to determine the final surface wipe concentration of the decontaminated natural gas pipeline and other non-porous metal surfaces;

8) Identification of facilities used to dispose of the PCB wastes listed in Condition 6 and method of disposal;

9) Date, time, and duration of decontamination job;

10) Name and business address of the Enviro Jet operator and supervisor for each job;

11) The name and address of each client whose natural gas pipeline and other non-porous metal surfaces were decontaminated by Enviro Jet;

12) Documentation that Enviro Jet and the facility at which Enviro Jet is operating have obtained any necessary Approvals and permits from federal, state and local agencies;

13) Any reports required by Conditions 4, 5, or 9, and,

14) Completed project check list.

b. Enviro Jet shall develop, compile, and maintain the records in Condition 7(a) in a paper log or electronically, as follows:

1) Enviro Jet shall maintain the records on the MDU, and make available for inspection the records for all jobs conducted by the unit for the previous five (5) years.

2) Enviro Jet shall compile the records for each facility within three (3) days of the end of operations at that facility and keep these documents at its main office in Calverton, NY, or another secure location, until at least ten (10) years after the decontamination date of the operations;

3) If records are electronic, Enviro Jet shall create a backup of all records in a manner that would prevent them from being lost if the original records were destroyed; and

4) Enviro Jet shall make the original records or, for electronic files, backup records, if the originals have been destroyed, available for inspection by authorized representatives of EPA upon request.

c. If either Enviro Jet initiates and completes closure while this Approval is in force or if the Approval expires, Enviro Jet shall electronically submit all the aforementioned records to the Director of PIID within 90 calendar days of certifying closure or the expiration, whichever comes first. Unless specified otherwise, required submissions or correspondence may be submitted electronically to ORCRPCBs@epa.gov.

d. Enviro Jet shall maintain annual records on the disposition of all PCBs and submit them annually to the Director of PIID in compliance with § 761.180(b).

(8) <u>Advance Notification of Operations</u>

a. 30-Day Advance Notification of Operations

1) Enviro Jet shall, at least 30 days prior to setting up operations at a facility, send a 30-day advance notification of operations by submitting the form in Appendix V to the

ORCR HQ contact identified in Condition 12, and to the appropriate EPA Regional PCB coordinator, state environmental agency, and local government environmental entities (if applicable) based on the location where operations will occur.

b. Information Included in 30-Day Advance Notification of Operations

1) The following information shall be included in the 30-day advance notification of operations discussed in Condition 8(a). The information included in Section A of the form in Appendix V will be available to the public (see Condition 8(c)) and may be used to schedule inspections and facilitate oversight of operations.

(i). Information Included in Section A of Form

A. Company: name, address, contact person name and phone number, the vehicle identification number (VIN) or state Department of Motor Vehicle license plate number for the MDU(s), and the number to a phone that is dedicated to the Enviro Jet operations at a facility; and

B. When and where the decontamination will occur: street address or other identifier for the facility, a name/phone number for the facility manager (if applicable), a brief description of the facility, the date the PCB activity is scheduled to begin, and the estimated duration (in days) of the operations.

(ii). Information Included in Section B of Form

A. Name of the company that owns the facility where the unit will be operating, as well as their mailing address, and a contact person name/phone number;

B. A name, title, and phone number for: the EPA ORCR contact, EPA Regional contact, state contact, and local contact; and

C. Description of the nature of the PCB activity: the type of decontamination process, estimates of the amount of natural gas pipeline and other non-porous metal surfaces decontaminated, and estimates of PCB concentration in the natural gas pipeline and other non-porous metal surfaces before treatment. These estimates shall be based on analytical data provided by the customer and/or analytical data from Enviro Jet.

2) Changes to 30-Day Advance Notifications of Operations

Except as provided below, if any change to the information submitted in the original 30-day advance notification of operations for a particular facility is necessary before operations have begun under that notification, Enviro Jet shall send an email that describes the change to those required to be notified by Condition 8(a) in advance of the operating start date that is stated in the original 30-day advance notification of operations. Enviro Jet may initiate the PCB activities as originally scheduled after it has submitted the change provided that no modification of this operating Approval is required.

Except as provided below, if any change to the information submitted in the original 30-day advance notification of operations for a particular facility is necessary after operations have begun under that notification, Enviro Jet shall send an email that describes the change to those required to be notified by Condition 8(a). Enviro Jet may continue the PCB activities after it has submitted the change provided that no modification of this operating Approval is required.

If Enviro Jet wishes to operate at a facility other than the facility identified in the original 30-day advance notification of operations or change the scheduled start date to an earlier date, Enviro Jet shall submit a new 30-day advance notification of operations to those required to be notified by Condition 8(a) (which may differ from those notified by the original 30-day advance notification of operations). Enviro Jet shall also notify those individuals to whom the original 30-day advance notification of operations was submitted of the date or location change. In such circumstances, Enviro Jet shall not initiate activities earlier than 30 days prior to submitting the new 30-day advance notification of operations.

c. Additional Notifications

In addition to the 30-day advance notification of operations prescribed in Condition 8(a) of this Approval, Enviro Jet shall provide the following additional notifications:

1) Enviro Jet shall provide the following information to local fire departments and other local emergency response authorities prior to operating in the jurisdiction where Enviro Jet intends to operate:

   (i). The 30-day advance notification of operations, provided in Appendix V.

   (ii). Safety Data Sheets (SDS) for the principal chemicals in and/or to be treated in the MDU or soaking tank (including PCBs and any other chemicals, if applicable);

   (iii). The approximate quantities of principal chemicals in each treatment unit, and/or to be treated in the treatment unit; and

   (iv). General location of Enviro Jet's MDU(s) and/or soaking tank scheduled to be at the facility.

2) Enviro Jet shall display a sign or flyer on the external boundary of the facility, where it would be visible to the public (e.g., posted on a fence abutting a road). This display shall include the following information:

   (i). Contact information for an Enviro Jet representative;

   (ii). Brief description of the type of waste being treated;

   (iii). Brief description of the Enviro Jet treatment process; and

(iv). Anticipated dates of operation at the facility.

3) Before treating PCB-contaminated natural gas pipeline and other non-porous metal surfaces in the MDU(s) and/or soaking tank, Enviro Jet shall either post this Approval document prominently on its website where visitors would reasonably expect to see announcements on environmental projects, or link to EPA's website where this Approval document is posted. Also, Enviro Jet shall either post all information in Section A of the 30-day advance notification of operations (described in Condition 8(a)) on the same web page as the Approval, or link to EPA's website where these notifications are posted. Both the Approval and Section A of the 30-day advance notifications of operations shall remain posted until 60 days after:

(i). This Approval is terminated, and permanent closure has been completed in accordance with Condition 16;

(ii). This Approval expires (provided Enviro Jet has not followed the procedures described in Condition 21 to allow the Approval to continue in force); or

(iii). The unit is closed in accordance with Condition 16.

(9) <u>PCB Spills</u>

In the event Enviro Jet believes, or has reason to believe, that a spill (as defined in EPA's PCB Spill Cleanup Policy in § 761.123) of PCBs has, or may have, occurred from any activities or devices related to Enviro Jet's operations under this Approval:

a. Enviro Jet shall notify the Regional PCB Coordinator and the ORCR HQ contact identified in Condition 12 by phone or email immediately after initial response actions have been taken to ensure the protection of human health and the environment. Enviro Jet shall control and clean up any spills of PCBs or other PCB-containing fluids as provided in the Spill Prevention, Control and Countermeasure Plan provided in the application to minimize the consequences of any release that may occur.

b. Enviro Jet shall submit a written report to the appropriate Regional PCB Coordinator and the Director of PIID no later than 15 business days after the spill occurred, that describes the: 1) spill; 2) known or suspected cause(s) of the spill; 3) operations that were being conducted prior to, and during, the spill; 4) cleanup actions conducted; and 5) changes in operations that Enviro Jet will implement to prevent such spills from occurring in the future.

c. Enviro Jet shall not resume operations until the cause of the spill has been determined and corrected to the satisfaction of EPA, and a written or emailed Approval is received from the ORCR HQ contact identified in Condition 12.

d. Enviro Jet shall also report PCB spills in accordance with applicable federal, state, and local requirements.

(10) Health and Safety

a. Enviro Jet shall maintain and operate its MDU(s) and soaking tank in a way that minimizes the possibility of a fire, explosion, or any unauthorized release of PCBs, including to air, soil, or surface water, which may pose an unreasonable risk of injury to health or the environment.

b. Enviro Jet shall take all necessary precautionary measures to ensure its operations are in compliance with applicable health and safety standards, as required by this Approval and other applicable federal, state and local laws, regulations and ordinances. Enviro Jet shall report by phone to the Regional PCB Coordinator and the ORCR HQ contact identified in Condition 12 by the end of the business day immediately following an incident that resulted in any lost-time injury occurring as a result of Enviro Jet's equipment or operations. Enviro Jet shall submit a written report describing the incident to the Director of PIID within five (5) business days.

c. Site-Specific Safety Plan

Before decontaminating any natural gas pipeline and other non-porous metal surfaces, Enviro Jet shall develop and maintain at the facility a site-specific safety plan for the activities covered by this Approval. Enviro Jet shall also provide a copy of the site-specific safety plan to the emergency coordinator of the facility where it intends to operate prior to Enviro Jet arriving at the facility. At a minimum, Enviro Jet shall include the following site-specific information in each site-specific safety plan:

1) Scope of work (description of the decontamination methods used, amount of PCB contaminated natural gas pipeline and other non-porous metal surfaces, and surface concentrations that might be found at any given time or in directly associated storage containers, and any hazardous materials to be used);

2) Project personnel, including roles, responsibilities and qualifications, name of on-site safety coordinator, and name(s) of any on-site cardiopulmonary resuscitation (CPR)/First-Aid certified person(s);

3) Emergency contact information, including local authorities (e.g., local fire and police departments) and nearest medical building that would accept patients contaminated with chemicals;

4) Hazard identification and control/mitigation measures;

5) Names of all chemicals used at the facility by Enviro Jet along with approximate quantities and the corresponding material safety data sheets (SDS); and

6) Emergency action plan(s) specifying the following:

(i). Contact information – project and property management, and the persons responsible for handling emergencies (with 24-hour a day contact in the event of an emergency), including both phone numbers and email addresses;

(ii). Evacuation plan(s);

(iii). Response procedures for reasonable emergency scenarios;

(iv). First aid location(s);

(v). Eye-wash station location(s);

(vi). Fire extinguisher location(s);

(vii). Location of SDS; and

(viii). Smoking/non-smoking areas.

Enviro Jet shall submit a copy of any site-specific safety plan to the ORCR HQ contact identified in Condition 12 or the applicable EPA Regional office upon request.

d. Emergency Coordinator

Enviro Jet shall, at all times, have at least one (1) designated employee either at the operating site premises or on call (i.e., available to respond to an emergency by reaching the operating site within 30 minutes) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the site-specific safety plan, operations and activities at the site, the location and characteristics of waste handled, and the facility layout, including the hazards associated with the facility location where the unit is operated.

e. Emergency Procedures

1) Whenever there is an imminent or actual release of PCBs, including to air, soil, or surface water, or an incident that results or may result in injury to health or the environment, for example from fire, spill, or explosion, the emergency coordinator (or their designee when the emergency coordinator is on call) shall immediately:

(i). Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(ii). Notify appropriate federal, state and/or local emergency response entities (e.g., fire departments) if their help is needed.

(iii). The Emergency Action Plan described in Condition 10(c)(6) should be used as a resource to expedite the emergency coordinator's response.

2) Whenever there is an imminent or actual release of PCBs, including to air, soil, or surface water, or an incident that results or may result in injury to health or the environment, for example from fire, spill, or explosion, the emergency coordinator shall as soon as practical identify the character, exact source, amount, and real extent of any released materials. The emergency coordinator shall also assess possible hazards to health or the environment that may result from the release or emergency incident. This assessment shall consider both direct and indirect effects of the release or emergency incident (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any PCB surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

3) If the emergency coordinator determines that the MDU(s) and/or soaking tank has had a release of PCBs or emergency incident which presents or may pose an unreasonable risk of injury to health or the environment outside the site or facility, the emergency coordinator must report the findings as follows:

   (i). If the assessment indicates that evacuation of local areas may be advisable, the emergency coordinator shall immediately notify appropriate local authorities; and

   (ii). The emergency coordinator shall immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center (using their 24-hour toll free number 1-800-424-8802). The notification must include:

      A. Name and telephone number of reporter;

      B. Name and address of facility;

      C. Time and type of incident (e.g., release, fire);

      D. Name and quantity of material(s) involved, to the extent known;

      E. The extent of injuries, if any; and

      F. The possible hazards to human health, or the environment, outside the facility.

4) During an emergency, the emergency coordinator shall coordinate with the facility emergency coordinator and take all reasonable measures necessary to ensure that releases or emergency incidents do not recur or spread to other PCB waste at the operating site. These measures must include, where applicable and when possible, safely shutting down the MDU(s) and/or soaking tank, collecting and containing released waste, removing or isolating containers and equipment, and other measures that can be implemented to protect health and the environment.

5) The emergency coordinator shall coordinate with the facility's emergency coordinator to assess if any facility operations/processes need to be suspended or if any immediate measures should be taken to minimize the risk of injury (e.g., from the

release of toxics or the spread of fire) that could occur due to the nature of facility operations and chemicals/products stored at the facility.

6) Immediately after a release or emergency incident has been contained, Enviro Jet shall provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release or emergency incident at the facility.

7) Enviro Jet shall notify the Regional PCB Coordinator and the ORCR HQ contact identified in Condition 12 of the release or emergency incident by phone immediately after initial response actions have been taken to ensure the protection of human health and the environment.

8) Enviro Jet shall submit a written report to the appropriate EPA Regional PCB Coordinator and the Director of PIID identified in Condition 12 no later than 15 business days after the emergency incident occurred that describes the: a) incident; b) cause(s) of the incident, c) operations that were being conducted prior to, and during, the emergency; d) cleanup actions conducted; and e) changes in operations that Enviro Jet implemented or will implement to prevent such incidents from occurring in the future.

9) Enviro Jet shall not feed any PCB material into the MDU(s) or soaking tank until the cause of the emergency incident has been determined and corrected to the satisfaction of EPA. Enviro Jet shall not resume PCB treatment operations until written or emailed confirmation is received from the ORCR HQ contact identified in Condition 12.

10) Enviro Jet shall also report PCB emergency incidents in accordance with applicable federal, state, and local requirements.

f. Fire Extinguishers

Enviro Jet shall maintain and clearly label fire extinguishers and other firefighting equipment that are capable of suppressing fires that may be associated with materials used or treated by Enviro Jet's process. Labeling shall be based on the compatibility of the extinguisher with the fire hazard and shall be available at the MDU(s) and soaking tank and within 25 feet of all work activities and operations. Multiple types of fire extinguishers and firefighting equipment may be necessary to address different fire hazards posed by Enviro Jet's operations and the wastes that it treats. All fire extinguishers must include the following:

1) Annual inspection tag;

2) A gauge indicating fully charged;

3) Pin with security seal; and,

4) Instructions on how to use.

g. Mobile Decontamination Unit (MDU) and Soaking Tank Placement

The MDU(s) and/or soaking tank shall be located where operations poses no unreasonable risk to health or the environment. For example, the decontamination units shall be located a minimum of 20 feet away from any storage area for flammable or combustible materials (e.g., flammable liquid storage tanks or drums), and shall not be located next to a sensitive ecosystem if the decontamination unit is operated outdoors.

(11) Security

Enviro Jet shall ensure its equipment is secure (e.g., with a fence, alarm system, signage) such that only those individuals participating in the operations and approved visitors are allowed in the area of Enviro Jet's equipment, regardless of whether or not it is operating.

(12) Notifications and Reports

Notifications or reports required to be mailed, shall be mailed to the Director of PIID, at USEPA Headquarters, 1200 Pennsylvania Avenue, N.W., OLEM/ORCR/PIID, Mail Code: 5303T, Washington, DC 20460. For electronic submission to the Director of PIID or ORCR HQ contact, Enviro Jet shall email the information to ORCRPCBs@epa.gov. Wherever practical, email is preferable to phone and mail communication, except where otherwise specified.

Phone numbers for EPA Regional PCB Coordinators can be found on the following website: https://www.epa.gov/pcbs/program-contacts. The ORCR HQ contact Nadja Solis Marcano can be contacted by email at solismarcano.nadja@epa.gov, or by phone at (202) 566-0356.

(13) Agency Approvals/Permits

Enviro Jet shall not operate at the facility unless Enviro Jet has obtained all required Approvals/permits from federal, state, and local agencies. Enviro Jet is responsible for obtaining such Approvals/permits. Once Enviro Jet has verified that both it and the facility (as applicable) have been issued all required Approvals/permits, Enviro Jet shall document that verification in their operating records which are described in Condition 7.

(14) Personnel Training

Enviro Jet shall ensure that personnel directly involved with the operations covered by this Approval are familiar with the requirements of this Approval. A copy of this Approval and the training materials shall be kept on the job site as either an electronic document or physical paper copy, and the materials shall be accessible to all personnel engaged in operations or sampling under this Approval during working hours. Enviro Jet shall also maintain a copy of the sampling and analytical procedures in the laboratory conducting the analyses.

The training materials must include standard operating procedures and a copy of this Approval. Enviro Jet shall annually train personnel and document training on the following:

a. Types of natural gas pipeline and other non-porous metal surfaces Enviro Jet manages, Enviro Jet's decontamination methods, and the upper PCB surface concentration limits for the natural gas pipeline and other non-porous metal surfaces which may be decontaminated;

b. The recordkeeping, notification, and reporting requirements identified in Condition 7, and the location of records and retention times;

c. The handling and/or PCB waste disposal requirements in the PCB regulations for process residuals and other materials generated during the decontamination process as described in Condition 6;

d. The safety, operating, and maintenance procedures in the PCB regulations, with an emphasis on the safe handling of PCB remediation wastes and natural gas condensate;

e. The procedures for using, inspecting, repairing, and replacing Enviro Jet's (and the facility's, if applicable) emergency and monitoring equipment; and

f. Enviro Jet's Spill Prevention, Control and Countermeasure Plan, as well as the requirements set forth in the PCB Spill Cleanup Policy in part 761, subpart G.

(15) <u>Waste and Equipment Transport Between Jobs Sites</u>

Enviro Jet shall not transport untreated PCB contaminated natural gas pipeline and other non-porous metal surfaces off-site. Enviro Jet shall comply with any applicable U.S. Department of Transportation (US DOT) requirements in 49 CFR part 172 when transporting other PCB-contaminated materials (e.g., decontamination solvent, personal protective equipment) off-site. Enviro Jet shall comply with applicable marking requirements for PCB containers in § 761.40 and decontaminate the MDUs and soaking tank by:

a. Flushing the internal surfaces of the container three times with a solvent containing < 50 ppm PCBs prior to transporting the equipment from the site. Each rinse shall use a volume of the flushing solvent equal to approximately 10 percent of the PCB Container capacity.

b. Any person decontaminating movable equipment contaminated by PCBs, tools, and sampling equipment may do so by:

   1) Swabbing surfaces that have contacted PCBs with a solvent;

   2) A double wash/rinse as defined in part 761 subpart S; or

   3) Another applicable decontamination procedure listed under § 761.79.

(16) Closure Cost Estimate and Plan, Financial Assurance, and Permanent Closure

a. Closure Cost Estimate and Plan

1) Prior to issuance of this Approval, Enviro Jet submitted to ORCR a written closure plan and closure cost estimate that identified the steps and quantified the estimated costs for the activities Enviro Jet shall conduct to permanently close their operations. The provisions of §§ 761.65(e)(4)-(8) and 761.65(f)(2)-(4) shall apply, except as otherwise provided in the Conditions of this Approval.

2) EPA may require Enviro Jet to adjust the closure plan or closure cost estimate to ensure no unreasonable risk of injury to health or environment.

b. Financial Assurance

1) Enviro Jet shall obtain and submit financial assurance for closure to the Director of PIID 60 days prior to commencing operations. EPA will review the financial assurance mechanism and may require Enviro Jet to revise the financial assurance mechanism prior to approving it. Enviro Jet shall establish financial assurance in accordance with the requirements in § 761.65(g) for commercial storage facilities. Enviro Jet shall not operate without the necessary financial assurance. Section 761.65(g) references the financial assurance mechanisms specified in part 264, subpart H of the Resource Conservation and Recovery Act regulations. Enviro Jet may choose any of the financial assurance mechanisms or combination of mechanisms provided for in the regulations. EPA may require variations in the wording of the instruments from that found at § 264.151. Enviro Jet must maintain financial assurance until certification that closure activities have been completed is accepted by EPA.

2) Enviro Jet shall provide evidence of the increased value of the financial assurance mechanism whenever necessary (e.g., annual inflation adjustment, change in closure cost estimate triggered by modification of closure plan) as required in § 264.143, which is incorporated by reference in § 761.65(g).

3) Enviro Jet shall also obtain financial assurance for the compensation of third parties for bodily injury and property damage caused by sudden and nonsudden accidental occurrences from, or related to, Enviro Jet's operations and submit to the Director of PIID at least 60 days prior to commencing operations. EPA will review the financial assurance mechanism and may require Enviro Jet to revise the financial assurance mechanism prior to approving it. Enviro Jet shall comply with the RCRA regulations that address third-party financial assurance liability requirements (i.e., § 264.147).

c. If Enviro Jet wishes to change the closure plan, closure cost estimate, or financial assurance mechanisms due to factors other than inflation, Enviro Jet shall submit an adjusted plan, cost estimate, or financial assurance mechanism (as applicable) to the ORCR HQ contact. EPA will review the change(s) and may require Enviro Jet to revise the adjusted closure plan, closure cost estimate, or financial assurance mechanism prior to approving it.

d. Permanent Closure

1) Failure to submit a request for renewal as described in Condition 21 will be treated as evidence of Enviro Jet's intent to close. If Enviro Jet does not submit a request for renewal before the time specified in Condition 21, Enviro Jet shall initiate closure procedures within 60 days of the last decontamination under this Approval.

2) In the event that Enviro Jet expects to cease operation permanently or for the remaining duration of the Approval, Enviro Jet shall initiate closure procedures within 60 days of the last decontamination under this Approval.

3) Enviro Jet shall notify the Director of PIID, in writing, at least 60 days prior to the date on which final closure is expected to begin (see § 761.65(e)(6)(i)).

4) Within 60 days of completion of closure, Enviro Jet shall submit by registered mail, a certification to the Director of PIID that the operations have been closed in accordance with the closure plan (see § 761.65(e)(8)). The certification of closure must be accepted by the Director of PIID before the Approval is released, or no longer applies.

5) During the closure activity period, Enviro Jet shall dispose of all contaminated system component equipment in accordance with the disposal requirements of part 761, subpart D or decontaminate the equipment in accordance with § 761.79.

6) Enviro Jet shall submit records to the Director of PIID within 90 days of concluding closure as required in Condition 7(c).

(17) <u>Ownership Transfer</u>

If Enviro Jet intends to transfer ownership to a new entity and the transferee wants to operate under the same or similar terms as this Approval, Enviro Jet shall notify the Director of PIID, in writing, at least 90 days before transferring ownership. Enviro Jet shall also submit to the Director of PIID, at least 90 days before such transfer, a notarized affidavit signed by the transferee that states the transferee is seeking an Approval to decontaminate natural gas pipeline and other non-porous metal surfaces. Failure of Enviro Jet to provide EPA with this required written documentation of the transfer within the specified time frame would be a violation of this Approval and the Approval would immediately terminate upon the transfer of ownership.

After receiving notification, EPA may: 1) issue an amended Approval substituting the transferee's company name for Enviro Jet's name; 2) require the transferee to conduct a demonstration test and/or apply for a new PCB decontamination Approval by either submitting a complete application request or a partial application request (e.g., that focuses on information that demonstrates the transferee has the ability to comply with the terms and conditions of this Approval, such as a summary of company personnel qualifications and previous training that are relevant to complying with the terms and conditions of this Approval, or a summary of previous compliance history, if applicable); or 3) a combination thereof.

To avoid a lapse in financial assurance for the transferred facility, the transferee shall establish financial assurance for closure compliant with Condition 16 and submit it to EPA before the Approval will be amended to transfer ownership. The transferee must select one of the financial assurance mechanisms listed in the PCB Regulations at § 761.65(g). EPA may require variations in the wording of the instruments from that found at § 264.151. The financial assurance mechanism must be effective as of the date of final Approval of the transfer (i.e., the date the amended Approval is signed by the Director of PIID).

The transferee shall not operate unless EPA either has amended this Approval to allow for such operation or has issued a new Approval to the transferee. The amended or new Approval may include additional and/or revised conditions that may be deemed necessary to apply to the transferee.

(18) Process/Equipment Modifications

Enviro Jet shall not make major modifications (e.g., changes of engineering design, ancillary hardware, or process capacity) to its MDUs or soaking tank prior to receiving written approval from the Director of PIID, to implement such major modifications. If Enviro Jet desires such major modifications, Enviro Jet shall submit an approval modification request to the Director of PIID. The Director may, depending on the nature of the major modification request, require Enviro Jet to conduct a demonstration test to ensure that Enviro Jet's process continues to be in compliance with the applicable performance standards included in this Approval and to ensure the method continues to operate in a manner that does not pose unreasonable risk of injury to health and the environment.

However, Enviro Jet may replace an MDU or the soaking tank with a newer unit, as long as it is substantially identical to the older unit. If Enviro Jet does this, it shall notify the ORCR HQ contact identified in Condition 12 and provide, at a minimum: the date of manufacture of the unit, the new VIN number of the unit, and a certification from Enviro Jet's Chief Executive Officer (CEO) that the new unit is substantially identical to the original demonstrated in terms of engineering design, hardware, and process capacity.

(19) Unit Operators

Operation of Enviro Jet's MDUs and soaking tank shall be managed and overseen by a qualified Enviro Jet employee at all times.

(20) Approval Expiration Date

This Approval shall become effective upon signature of the Director of PIID and expire five (5) years from the date of signature, except as otherwise specified in Condition 21.

(21) Approval Continuation and Renewal

If Enviro Jet intends to continue to operate beyond the expiration date of this Approval, Enviro Jet shall submit an approval renewal request and, if required (see below), a complete demonstration test plan to EPA at least 180 days prior to the expiration date of this Approval. If Enviro Jet submits this information to EPA at least 180 days prior to the expiration date of

this Approval, this Approval continues in force (i.e., does not expire) until EPA either issues an approval renewal, a conditional approval renewal, or an approval request denial. Enviro Jet will not be allowed to operate under revised operating conditions until EPA issues Enviro Jet a fully renewed, and revised, operating approval. If Enviro Jet does not submit a complete approval renewal request and, if required, a complete demonstration test plan to EPA at least 180 days prior to the expiration date of this Approval, this Approval will expire as specified in Condition 20.

A complete approval renewal application and complete demonstration test plan shall be, at a minimum, information that was submitted in previous requests for approval applications and demonstration test plans, with appropriate modifications or updates based on proposed revisions to the original approval, or prior approval renewals, which may include design and operation changes, updated safety protocols, and revised operating and testing procedures. For example, if Enviro Jet is seeking approval to decontaminate another type of pipeline material, the approval application and demonstration test plan shall reflect those changes. Revisions may also include analytical procedure descriptions, and the results/data used to determine compliance with the decontamination levels specified in § 761.79(b).

EPA may require Enviro Jet to conduct a new demonstration test to assure EPA that Enviro Jet will continue to operate its MDUs and soaking tank in accordance with the applicable performance standards and in a manner that does not pose an unreasonable risk of injury to health or the environment. Enviro Jet is encouraged to contact the ORCR HQ contact identified in Condition 12 in advance of 180 days prior to the expiration date of this Approval if Enviro Jet intends to renew this Approval in order to ascertain whether EPA would require Enviro Jet to conduct a new demonstration test. This is especially important if Enviro Jet wants to make changes to its operating parameters (e.g., decontaminating a different type of pipeline material). Under those circumstances, Enviro Jet will not be allowed to operate under revised operating conditions until EPA issues Enviro Jet an approval renewal allowing such revised operating conditions.

(22) <u>Mobile versus Permanent Operation</u>

This Approval is for mobile operation of Enviro Jet's MDU(s) and soaking tank. If Enviro Jet operates the MDU(s) and/or soaking tank at a facility for 60 cumulative days or longer within any calendar year, then such operations are considered permanent operations requiring a separate approval, with the following exception. Enviro Jet may, pursuant to the provisions in Condition 22(b), request EPA to waive the requirement to obtain a separate approval for permanent operations.

a. <u>Advance Notification and Approval Process for Transitioning from Approved Mobile Operations to Approved Permanent Operations</u>

The following requirements are applicable only if Enviro Jet intends to operate the MDU(s) and/or soaking tank at a site for greater than 60 cumulative days in a calendar year, and apply irrespective of whether Enviro Jet, pursuant to the provisions in part (b)(i) of this Condition, requests EPA to waive the requirement to obtain a separate approval for permanent operations:

1) Notification Requirements Prior to Transitioning from Approved Mobile Treatment Operations to Approved Permanent Treatment Operations

(i). Enviro Jet shall provide advance written notification of their proposed intent to change to permanent operating status at least 7 calendar days prior to the 60th cumulative day of operations to the Director of PIID and the EPA Regional PCB coordinator.

(ii). This notification shall indicate whether Enviro Jet anticipates conducting operations in more than one EPA Region after leaving the permanent operations facility. If Enviro Jet anticipates conducting operations in more than one EPA Region after leaving the permanent operations facility, Enviro Jet shall include in the notification whether such anticipated treatment activities will use:

A. The MDU(s) and/or soaking tank covered by this Approval;

B. New MDUs or soaking tanks that are identical to the unit covered by this Approval; or

C. New MDUs or soaking tanks that are designed differently than the unit covered by this Approval.

Enviro Jet's future operating plans can impact whether the permitting authority will be EPA HQ or EPA Region pursuant to § 761.79(h).

2) Approval Requirements and Process for Transitioning from Approved Mobile Operations to Approved Permanent Operations

(i). Enviro Jet shall not operate for more than 60 cumulative days in a calendar year at a facility without first obtaining a separate approval from the applicable EPA approval issuance authority to operate a permanently-based unit.

(ii). EPA, at its discretion, may:

A. Require Enviro Jet to conduct a demonstration test; and/or

B. Require Enviro Jet to submit other information to EPA including, but not limited to: a demonstration test plan, a demonstration test report, and an application.

C. Approve or deny Enviro Jet's request.

(iii). Requirements described in parts (a)(2)(A) and (a)(2)(B) of this Condition do not apply if Enviro Jet operates pursuant to a waiver described in part (b) of this Condition.

b. <u>Requirements and Process to Waive the Requirements in Part (a)(2) of this Condition</u>

1) Waiver Request

(i). Enviro Jet may request EPA to waive the requirements in parts (a)(2)(A) and (a)(2)(B) of this Condition once per year. Enviro Jet shall submit such a request to the Director of PIID at least 7 calendar days prior to the 60th cumulative day operating at a particular facility.

(ii). If, pursuant to part (b)(1)(A) of this Condition, Enviro Jet submits a request to EPA to waive the requirements in parts (a)(2)(A) and (a)(2)(B) of this Condition, and EPA has either approved or not yet made a determination on Enviro Jet's waiver request, then Enviro Jet may continue operating for up to ten (10) days after the 60th cumulative day at a facility.

(iii). If granted, such a waiver does not release a facility from any regulatory requirements to obtain other TSCA PCB approvals (e.g., a commercial storage approval).

2) EPA Decision on a Waiver Request

(i). EPA may:

A. Approve the waiver request and allow Enviro Jet to continue to operate pursuant to the conditions of this Approval; or

B. Request additional information; or

C. Deny Enviro Jet's waiver request.

c. Transitioning Back to Mobile Operation Status after Approved Permanent Operations Have Concluded

1) Enviro Jet shall submit a notification 45 days in advance of mobilization to both the Regional EPA Administrator and the Director of PIID if Enviro Jet would like to resume mobile operations.

2) Prior to mobilization, Enviro Jet shall comply with any applicable closure and decontamination requirements that are specified in the waiver and the applicable operating approval.

3) EPA may modify this Approval based on information that becomes available prior to allowing Enviro Jet to transition from permanent operation status to mobile operation status. Enviro Jet may also request EPA to modify certain approval conditions that may not be appropriate or necessary for mobile operations.

4) If Enviro Jet anticipates transitioning back to mobile operation status after the expiration date of this Approval, Enviro Jet shall submit a renewal application to EPA no later than 180 days prior to the expiration date of this Approval if they wish to

ensure they can operate pursuant to this Approval in the event EPA does not make a final decision on the renewal application prior to this Approval's expiration date.

DECISION TO APPROVE ENVIRO JET'S REQUEST TO USE ALTERNATIVE DECONTAMINATION AND SAMPLING SITE SELECTION PROCEDURES

1. Approval under § 761.79(h) to decontaminate natural gas pipeline and other non-porous metal surfaces contaminated with PCBs, as limited in this Approval, is hereby granted to Enviro Jet Technologies (Enviro Jet), of Calverton, NY, subject to the conditions of this Approval, and consistent with the information included in the application, demonstration test plans and reports submitted to EPA by Enviro Jet. Where there are discrepancies between this document and the application, this document must be followed.

2. When operating under the self-implementing approach under § 761.79(c), EPA finds it is acceptable to allow Enviro Jet to filter and reuse Enviro Clean after use instead of disposing of it, as long as the PCB concentration before reuse is < 2 ppm, which is the concentration set out in § 761.79(c)(3)(iii), and this Enviro Clean concentration is not the result of dilution. In addition, based on the demonstrations and part 761, subpart T validation study, the design aspects of the decontamination system, and the operating parameters and safety requirements included in this Approval, EPA finds that Enviro Jet's process performs as well as the decontamination procedures in § 761.79(c), and will not pose an unreasonable risk of injury to health or the environment.

3. When operating under the measurement-based approach under § 761.79(b), EPA finds that Enviro Jet's proposal to use alternative sampling site selection procedures specified under subpart M for natural gas pipeline is acceptable because, while subpart P will generally require more samples than subpart M, subpart M was designed with knowledge of the shape and use of natural gas pipeline to target the bottom of the pipe where PCBs are most likely to settle. Therefore, subpart M is equivalent to subpart P, and further, EPA finds that the use of subpart M in accordance with this Approval will not pose an unreasonable risk of injury to health or the environment.

4. EPA reserves the right to impose additional conditions or revoke this Approval when it has reason to believe that the continued operation of Enviro Jet's alternative decontamination process does not adequately meet the applicable performance standards and decontamination levels; may pose an unreasonable risk of injury to health or the environment; new information requires changes to this Approval; and/or EPA issues new regulations or standards that impact conditions of this Approval.

5. EPA will make reasonable efforts, taking into account the nature of the risk, to provide reasonable advance notice to Enviro Jet and to provide opportunity for Enviro Jet to comment on any modifications or termination of the Approval. EPA may require Enviro Jet to immediately suspend operations while EPA is deciding whether to impose approval modifications or to terminate this Approval.

6. Any departure from the conditions of this Approval or the terms expressed in the application must receive prior written authorization from the Director of PIID. Enviro Jet shall be responsible for the actions of its employees and contractors that assist with Enviro Jet's operations when those actions are related to performance of the process, including operating or moving the equipment. Enviro Jet shall assume full responsibility for compliance with this

Approval and all applicable federal, state and local requirements including, but not limited to, any malfunction, spill, pollutant release, incident, or other reporting requirements.

7. EPA reserves the right for its employees or agents to inspect Enviro Jet's PCB decontamination or disposal activities covered by this Approval at any location and at any reasonable time.

8. Violations of any applicable regulations or conditions of this Approval may be subject to enforcement action and may result in termination of this Approval. Violation of any requirement of this Approval is a violation of §§ 761.79 and 761.50(a) and may also be a violation of other provisions of part 761. A violation of the PCB regulations is a prohibited act under Section 15 of TSCA.

3/21/23

Date

Digitally signed by SONYA SASSEVILLE
Date: 2023.03.21 11:28:17 -04'00'

Sonya M. Sasseville, Director
Program Implementation and Information Division

APPENDIX I

COMPANY BACKGROUND

Enviro Jet Technologies (Enviro Jet), an operating division of Miller Environmental Group, Inc., is located in Calverton, NY, and provides decontamination services to the natural gas, electric, and petrochemical industries. Enviro Jet is the sole owner of two (2) Mobile Decontamination Units (MDUs), which are designed to decontaminate natural gas pipeline contaminated with PCBs, by way of high pressure spraying with Enviro Clean (a 10% terpene hydrocarbon decontamination solvent). Enviro Jet is also the sole owner of three (3) 20-yard soaking containers and one (1) 10-yard soaking container, which are used to decontaminate natural gas pipeline and other non-porous metal surfaces by soaking the materials in Enviro Clean for no less than two (2) hours. Enviro Jet's mobile PCB decontamination services primarily service entities east of the Mississippi River, but may extend to entities nationwide. Enviro Jet's core business comes from the decontamination and cleaning of natural gas pipeline, storm sewers, water mains and related equipment. Pursuant to 40 CFR 761.79(h), EPA previously approved Enviro Jet for the use of alternate decontamination procedures in an initial Approval issued on August 8, 2007, and a renewal Approval issued on July 6, 2017, which expired on July 6, 2022 and was administratively continued. Enviro Jet submitted its application for renewal dated January 4, 2022, requesting a self-implementing decontamination Approval pursuant to § 761.79(h)(2), and a decontamination demonstration test plan dated May 5, 2022. The demonstration test was carried out on May 17-18, 2022, at National Grid's facility located at Brooklyn, NY.

Enviro Jet conducted decontamination demonstrations in 2001, 2005, 2013 and 2022 to confirm performance of both decontamination methods. EPA representatives observed the demonstrations and collected wipe samples before and after the decontamination. Results of the analysis from the demonstrations, which are summarized in Appendix IV of this Approval, indicate that Enviro Jet's spraying and soaking decontamination methods using Enviro Clean have the ability to reduce PCBs at a surface concentration of $\leq$ 5000 µg/100 cm^2 to levels $\leq$ 10 µg/100 cm^2. This level of decontamination was used as a measure of success for the demonstrations, as it is the level identified for non-porous surfaces in § 761.79(b)(3)(i)(A) for unrestricted use.

It is noteworthy that some of the samples from the 2022 demonstration resulted in a PCB concentration above the required levels (> 10 µg/100 cm^2) after decontamination. For the soaking process, the post Enviro Clean solution PCB concentration was within allowable levels (< 2 µg/L). This result is attributed to a dilution factor caused by the small mass of PCB introduced onto the pipe from spiking in comparison with the 1,900 gallons of decontamination solution utilized. In a real-world scenario if a pipe section is contaminated with PCBs the full length of the pipe (typically 12-18') would be impacted. Also, it is not uncommon for more than one pipe section to be removed from the same work site accounting for even more PCB mass being removed from the pipe and into the Enviro Clean solution. Thus, in a real-world scenario, Enviro Jet would have taken notice of elevated post solution levels and repeated the decontamination process following Conditions 2 and 4 of this Approval. For the jetting process, the post Enviro Clean solution was above required levels, and in a real-word scenario Enviro Jet would have noticed and repeated the decontamination process following Conditions 2 and 4 of

this Approval. EPA concluded that the 2022 demonstration results are within the scope of this Approval for the reasoning stated above.

In addition to the demonstrations, Enviro Jet conducted a validation study for their decontamination solvent, Enviro Clean, in accordance with part 761, subpart T – "Comparison Study for Validating a New Performance-Based Decontamination Solvent Under § 761.79 (d)(4)." As identified in Enviro Jet's Approval application, Enviro Jet filters and samples Enviro Clean after each job, and reuses Enviro Clean if it is < 2 ppm, which is the concentration set out in § 761.79(c)(3)(iii). Filters, among other decontamination wastes and residues, are disposed of in accordance with § 761.79(g).

In addition, in their application, Enviro Jet requested to use part 761, subpart M to determine the sampling locations of natural gas pipelines after decontamination instead of subpart P which is required under § 761.79(f). Enviro Jet would still use subpart P to determine the sampling locations for natural gas pipeline appurtenances and other non-porous metal surfaces.

Enviro Jet is the owner of the following two regulated MDUs:

#1 MEG #503
First Permitted EJMDU – May 2002
2000 Freightliner Jet/Vac Truck
VIN #: 1FV6HJBA2YHF28853

#2 MEG #505
First Permitted EJMDU – May 2003
2004 Kenworth Jet/Vac Truck
VIN #: 2NKMHD7XX4M397826

APPENDIX II

PROCESS DESCRIPTION

Process Description:

Spraying:

Prior to Enviro Jet arriving on site the pipeline will have been emptied of all contents, and the access pit will have been prepared and shored, if needed. If not already done, Enviro Jet will cut the pipe for the installation of their Pipe Entry Device (PED). Prior to spraying, the pipe will be visually inspected to determine the amount of scaling and sediment present.

Enviro Jet's MDU high pressure spraying process utilizes Enviro Clean. The pre-cleaning PCB concentration of Enviro Clean will always be < 2 ppm. The process utilizes a jet pump operating at 1500-2000 psi that propels a radial vortex nozzle through the pipe segment. The nozzle applies the Enviro Clean solution at a rate of 40 gallons per minute under pressure. The nozzle moves through the pipe at an upstream linear velocity of 3 feet per second and a downstream linear velocity of 1 foot per second. The total volume of Enviro Clean solution applied to the pipe segment is a minimum of 10% of the internal volume for each pipe segment. Simultaneously, the solution is recovered by a high-performance vacuum pump operating at 27" Hg, which can be operated simultaneously with the jet pump. A 95% solvent recovery is confirmed and documented for the process. The solution recovery rate is determined by taking tank level measurements pre- and post-spray with the MDU's level gauges, which indicate the total volume of Enviro Clean in each tank.

Enviro Jet's MDU houses two (2) segregated tanks, each holding a maximum volume of 1,100 gallons of storage. The tank on the rear end of the truck is the vacuum recovery tank and the forward tank supplies the jet pump. The MDU also has the ability to transfer Enviro Clean between the two tanks, to allow for continuous operation without the need to refill the truck. The MDU also has the ability to filter the Enviro Clean within the closed loop system to remove PCBs. The filters on the MDUs also act as a sediment filter, as indicated below.

Enviro Jet uses three (3) spraying cycles, minimum, in decontaminating natural gas pipeline if it does not have scale, grit, oil, or other particles on the internal surface. In the event of the presence of scale, grit, oil, and other sediments, five (5) cycles are used to ensure total decontamination. For purposes of determining whether three (3) or five (5) cycles are required, Enviro Jet monitors the filter on the MDU. If the filter exceeds 15 psi at any time during the three passes, significant sediment is present and five (5) passes are required. A visual inspection of the pipe is also conducted and recorded on the project check list.

At the conclusion of the spraying process, the post wash Enviro Clean is analyzed to confirm the PCB concentration does not equal or exceed 2 ppm following the regulatory standard cited in § 761.79(c)(3)(iii).

Soaking:

The soaking tanks are maintained at Enviro Jet's corporate office in Calverton, NY when not in use, and are transported to and from the job site via a roll off truck.

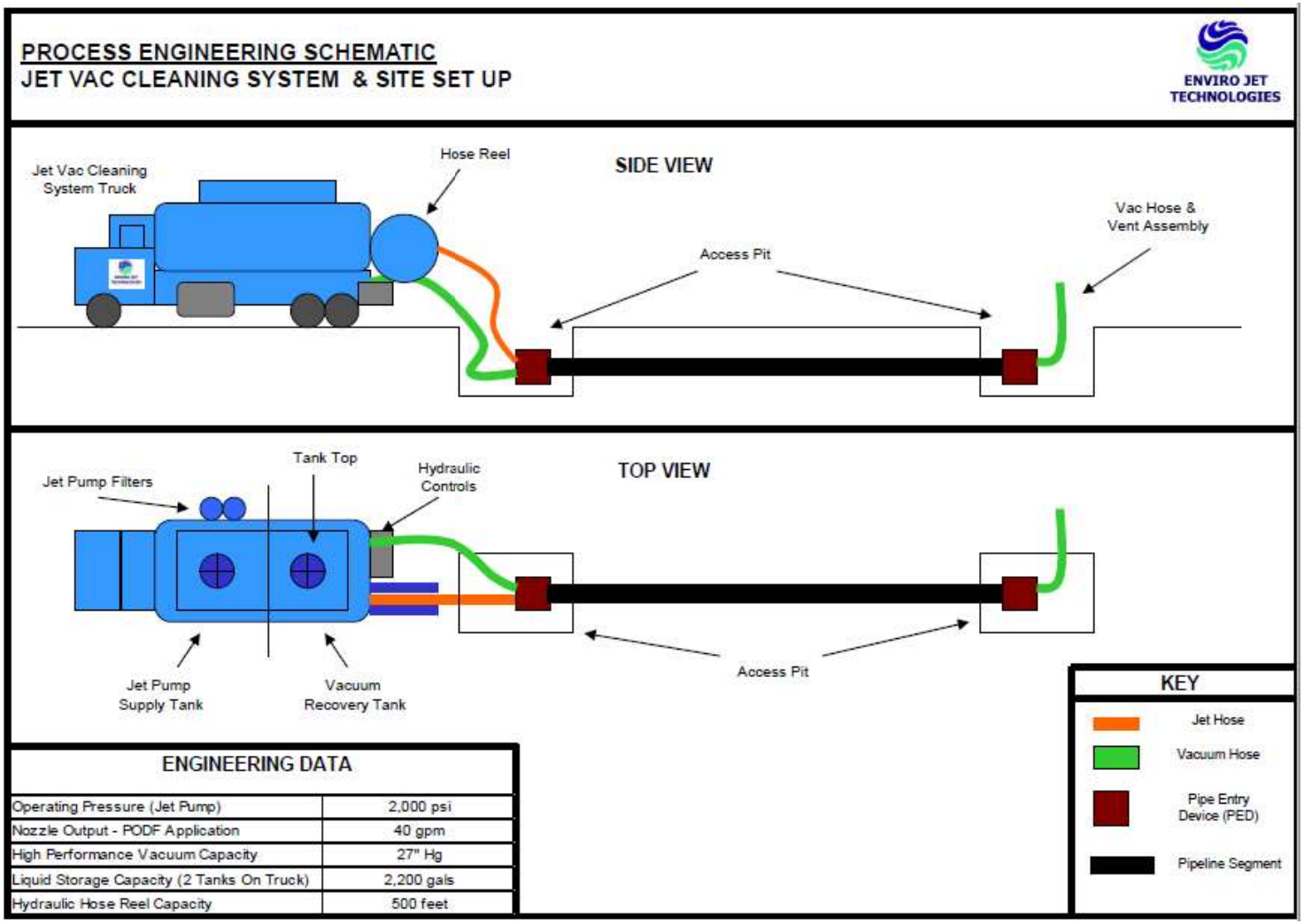
Enviro Jet's soaking decontamination process also utilizes Enviro Clean. The pre-cleaning PCB concentration of Enviro Clean will always be < 2 ppm. The soaking decontamination process involves one of Enviro Jet's three (3) 20-yard containers, or the one 10-yard roll off container with a ribbed bottom. Sections of pipe and appurtenances are loaded into the container, and Enviro Clean is added until all pipes and appurtenances are completely submerged. The articles are allowed to soak for a period of at least two (2) hours. The Enviro Clean is then vacuumed from the container using Enviro Jet's MDU, and then processed through the two (2) filters on the MDU. Pipes and appurtenances are put into designated containers for offsite disposal. Soaking operations are conducted when the ambient temperature is between 39°F and 99°F.

At the conclusion of the soaking process, the post-wash Enviro Clean is analyzed to confirm the PCB concentration does not equal or exceed 2 ppm following the regulatory standard cited in § 761.79(c)(3)(iii). If the Enviro Clean is ≥ 2 ppm, it is filtered with an activated carbon system and re-analyzed to verify the PCB concentration is < 2 ppm prior to reuse. Enviro Clean solution that is not being reused, is disposed of in accordance with § 761.79(g).

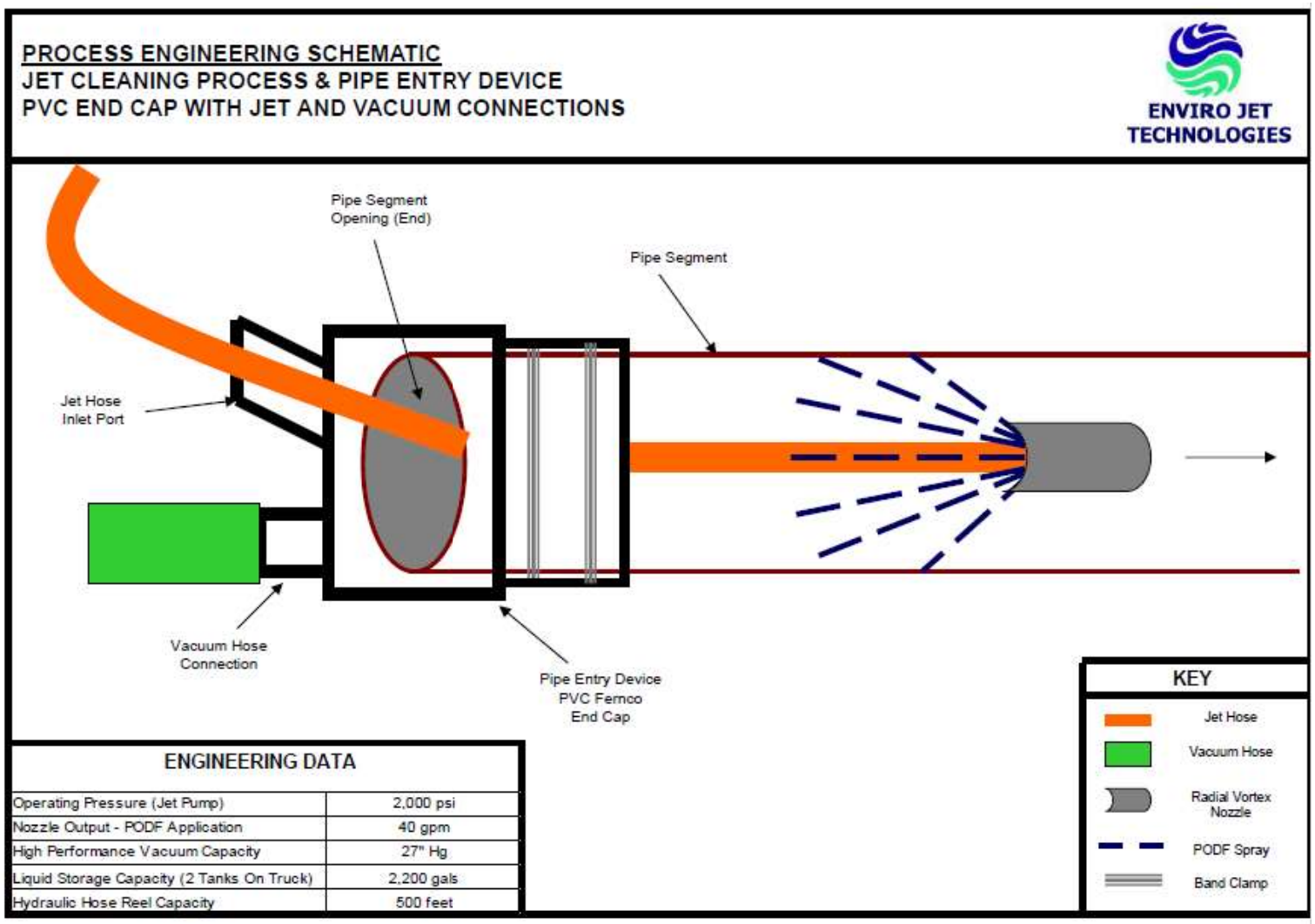
APPENDIX III

FLOW DIAGRAMS

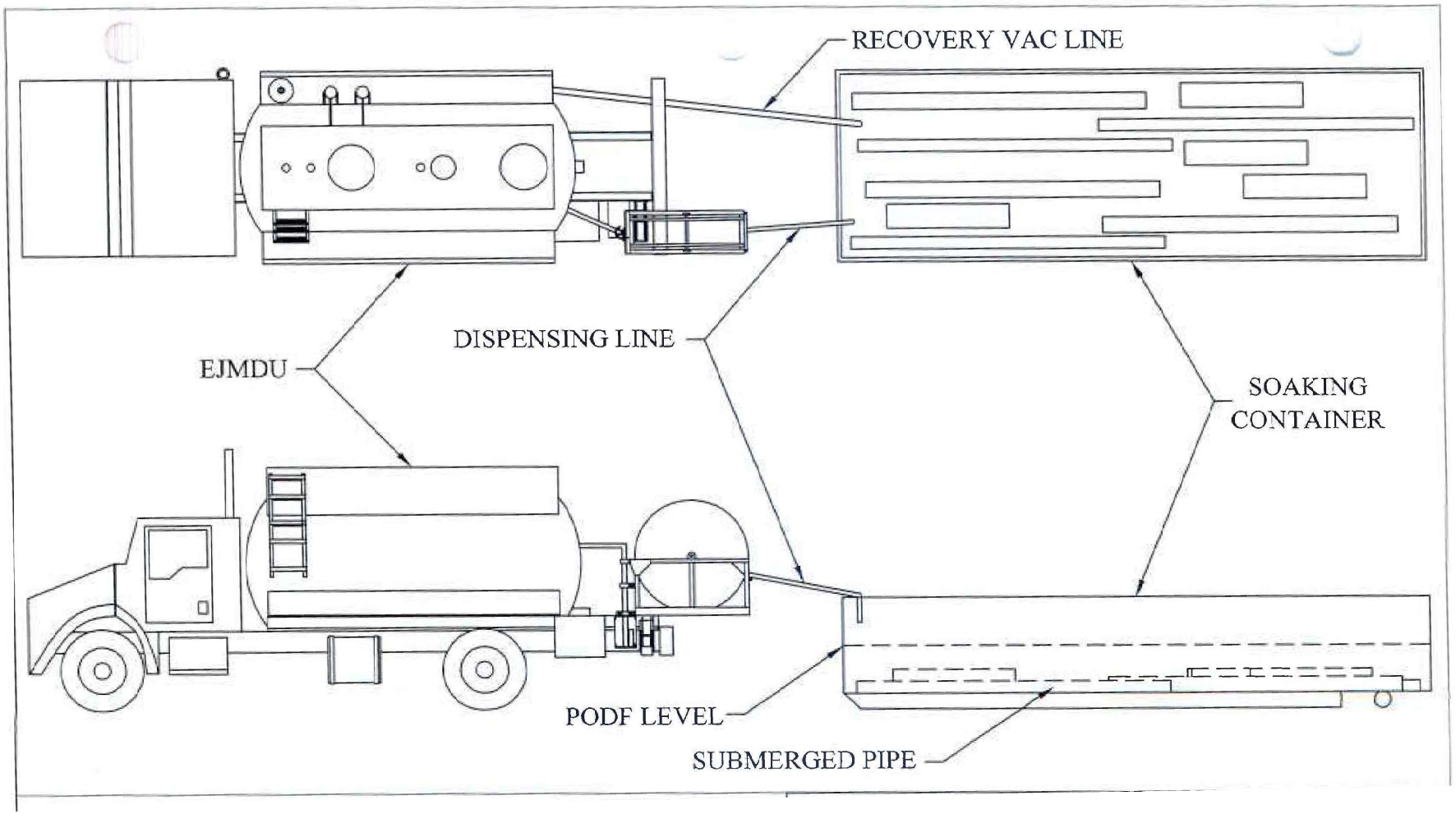
SPRAYING PROCESS



SPRAYING PROCESS (DETAILED)



SOAKING PROCESS



APPENDIX IV

SUMMARY OF DEMONSTRATION TEST RESULTS
FOR THE ENVIRO JET DECONTAMINATION PROCESS

2001 – Spraying Process:

Sample ID	**Pre Clean 1**	**Pre Clean 6**	**Post Clean 1**	**Post Clean 2**	**Post Clean 3**	**Post Clean 4**	**Post Clean 5**	**Post Clean 6**
Collection Date	10/5/2001	10/5/2001	10/5/2001	10/5/2001	10/5/2001	10/5/2001	10/5/2001	10/5/2001
Analysis Date	10/7/2001	10/7/2001	10/7/2001	10/7/2001	10/7/2001	10/7/2001	10/7/2001	10/7/2001
Matrix	Solid	Solid	Solid	Solid	Solid	Solid	Solid	Solid
Sample Size	100 cm^2	100 cm^2	100 cm^2	100 cm^2	100 cm^2	100 cm^2	100 cm^2	100 cm^2
Units	µg/100cm^2	µg/100cm^2	µg/100cm^2	µg/100cm^2	µg/100cm^2	µg/100cm^2	µg/100cm^2	µg/100cm^2
Aroclor 1016	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U
Aroclor 1221	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U
Aroclor 1232	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U
Aroclor 1242	6532	8091	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U
Aroclor 1248	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U
Aroclor 1254	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U
Aroclor 1260	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U

U – indicates compound was analyzed for but not detected.

2005 – Soaking Process:

Starting PCB Concentration (µg/100 cm^2)	Test Date	Final PCB Concentration by Soak Time		
		2 hours	4 hours	6 hours
2,500	9/26/2005#		4.7	
2,500	9/27/2005#	3.4		
2,500	9/27/2005#		8.2	
2,500	9/28/2005#	<2		
2,500	9/28/2005#		<2	
2,500	9/29/2005*	<2		
5,000	9/28/2005#	<2		
5,000	9/28/2005#		<2	
5,000	9/28/2005#			<2
5,000	9/29/2005*	9.33		
5,000	9/29/2005*		<2	
5,000	9/29/2005*			<2
5,000	9/30/2005*	<2		
5,000	9/30/2005*		<2	
5,000	9/30/2005*			<2
# - sample plates were selected by EPA * - sample plates were selected by Enviro Jet at EPA's request				

2013 – Reconfirmation of Spraying and Soaking Processes:

Client ID	NG – PRE13	NG – PRE11	NG – PRE16	NG – POST13	NG – POST11	NG – POST16	BLANK
Battelle ID	M1214-P	M1215-P	M1216-P	M1217-P	M1218-P	M1219-P	M1220-P
Collection Date	12/05/13	12/05/13	12/05/13	12/05/13	12/05/13	12/05/13	12/05/13
Extraction Date	12/12/13	12/12/13	12/12/13	12/12/13	12/12/13	12/12/13	12/12/13
Analysis Date	12/18/15	12/18/15	12/18/15	12/18/15	12/18/15	12/18/15	12/18/15
Analytical	ECD	ECD	ECD	ECD	ECD	ECD	ECD
Instrument	NA	NA	NA	NA	NA	NA	NA
% Moisture	16.8 °C	16.8 °C	16.8 °C	16.8 °C	16.8 °C	16.8 °C	16.8 °C
Temperature	WIPE	WIPE	WIPE	WIPE	WIPE	WIPE	WIPE
Matrix	100 cm^2	100 cm^2	100 cm^2	100 cm^2	100 cm^2	100 cm^2	100 cm^2
Sample Size	ng/100 cm^2	ng/100 cm^2	ng/100 cm^2	ng/100 cm^2	ng/100 cm^2	ng/100 cm^2	ng/100 cm^2
Units							
Aroclor 1016	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U
Aroclor 1221	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U
Aroclor 1232	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U	0.032 U
Aroclor 1242	70.6466	14.4147	57.3509	10.1405	13.8542	16.6965	0.032 U
Aroclor 1248	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U
Aroclor 1254	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U
Aroclor 1260	14.5842	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U	0.009 U
Total (ng/100 cm^2)	85.3	14.5	57.5	10.3	14.0	16.8	0.2 U
Total (µg/100 cm^2)	0.0853	0.0145	0.0575	0.0103	0.0140	0.0168	0.0002 U

ECD – Electron Capture Device

U – indicates compound was analyzed for but not detected.

2022 – Reconfirmation of Spraying and Soaking Procedures:

SOAKING	PRE (µg/100 cm^2)	POST (µg/100 cm^2)	% REDUCTION
Cast Iron 10'' Pipe	68.5	3.43	95
Steel 12'' Pipe	245	11.7	95
JETTING			
Steel 20'' Pipe	236	30.2	87
Steel 8'' Pipe	138	81.7	41

Field Blank: 0.188 µg/100 cm2
Sample taken from Soaking Container, Post Soaking: < 2.00 µg/L
Sample taken from Jetting Truck, Post Jetting: 84 µg/L

Note: While some of the "POST" samples were above the required levels, Conditions 2 and 4 of this Approval account for this scenario. Specifically, this Approval requires the jetting or soaking process be repeated a maximum of three (3) times until the Enviro Clean solution is below allowable levels (< 10 ppm). The sample taken post-soaking during this demonstration is less than 2.00 µg/L; however, this result reflects the context of the demonstration rather than a real-world scenario. Specifically, the demonstration involved spiking with PCBs two 100 cm^2 areas on two short sections of pipe which were then placed into a normal container volume (1,900 gallons) of decontamination solution. The relatively high volume of decontamination solution vs. the small mass of PCBs spiked on the pipe would make it improbable that the PCBs would be detected in the post-soaking analysis of the decontamination solution, due to significant dilution. In a real-life scenario, if a pipe section were contaminated with PCBs, the full length of the pipe, not just the 100cm^2 spiked area, would be impacted and thus the post-soaking analysis would likely identify the presence of PCBs.

APPENDIX V

SAMPLE 30-DAY ADVANCED NOTIFICATION OF OPERATIONS FORM

Section A

Company

Name: Enviro Jet Technologies
Address: 538 Edwards Avenue, Calverton, NY 11933
Contact Person Name and Phone: _____
VIN or License Plate Number of Unit: _____
Phone dedicated to the unit that the unit operator(s) have access to that goes with the unit to each site: _____

When and Where Decontamination Will Occur:

Street Address or Other Identifier for Site: _____
Facility Manager: _____
Phone Number for Facility Manager: _____
Brief Description of the Facility/Site: _____
Date Treatment Operations Expected to Begin: _____
Estimated Duration of the Treatment Operations (in Days): _____

Section B

Company that Owns the Facility where the Unit will be Operating

Name: _____
Mailing Address: _____
Contact Person Name and Phone: _____

Person, Organizational Affiliation/Title, and Phone Number for:

EPA ORCR Contact: Nadja Solis Marcano, EPA ORCR, PCB Approval Writer, (202) 566-0356, ORCRPCBs@epa.gov
EPA Regional Contact: _____
State Contact: _____
Local (Town/City/County) Contact: _____

Nature of the Activity:

Type of PCB Decontamination Process: _____
Quantity of Natural Gas Pipeline Decontaminated: _____
Quantity of Other Non-Porous Surfaces Decontaminated: _____
Concentration of PCBs in the Pipeline Before Treatment: _____
Concentration of PCBs in other Non-Porous Surfaces Before Treatment: _____