

DRAFT

Craig Renner
General Manager
Trans-Cycle Industries of Ohio, LLC
150 Ira Bean Parkway
Richwood, Ohio 43344

Re: Major Modification to the April 27, 2018, Federal TSCA PCB Commercial Storage Approval, Trans-Cycle Industries of Ohio, LLC; OHW 000 205 856

Dear Mr. Renner:

The U.S. Environmental Protection Agency received a Request for Modification to the April 27, 2018, "Approval to Commercially Store Polychlorinated Biphenyls (PCBs)" (Approval) for Trans-Cycle Industries of Ohio, LLC (TCI) located at 150 Ira Bean Parkway, Richwood, Ohio. The original modification request was received on January 4, 2021. Based on EPA comments, a revised modification request, titled "Request for Modification to PCB Commercial Storage Approval", dated March 2021, was received on March 24, 2021.

In September 2020, TCI purchased Building 130 which is adjacent to Building 150, the building purchased by TCI in May 2017 that has an area approved for PCB Commercial Storage. The application for modification includes: (1) a decrease to the size of the footprint of the existing PCB commercial storage area in Building 150 to allow for better access to the processing area for non-PCB material, (2) the addition of a second PCB commercial storage area in the adjacent Building 130, and (3) a reduction of the maximum allowable PCB inventory (see Figures in the attachment for layout of buildings and PCB storage areas). The modification request includes a revised application with a revised closure plan and cost estimate. Based upon EPA's review of the relevant documents, EPA finds that the requested modification to the PCB storage areas and decrease of the maximum allowable PCB inventory does not affect overall performance or environmental impact. In accordance with Condition, I.G., Approval Modification, EPA finds that the requested design changes, dated March 2021, constitute a major modification.

DRAFT

The modifications to the April 27, 2018, TSCA PCB Commercial Storage Approval are as follows:

1. Condition III.A. shall now be as follows:

A. Storage Area

All PCBs and PCB Items must be stored in the approved storage areas, as identified below in Condition III.C and on Figure 5, Facility Layout - 150, and on Figure 6, Facility Layout – 130, of the approved application for modification dated March 2021, and which are attached to this Modification.

2. Condition III.C.1. shall now be as follows:

1. PCB Storage Area:

At any given time, TCI shall store no more than the total volume or weight of PCBs and PCB Items in the PCB storage areas as identified in the table below and in the approved application for modification dated March 2021.

<u>PCB Storage Area</u>	<u>Type of Waste</u>	<u>Maximum Volume/Weight</u>
Building 150 PCB Storage Area	PCB-contaminated liquids and PCB liquids in containers or articles	24,500 gallons
	Drained PCB and PCB-Contaminated Articles	14,000 pounds
	PCB Debris/Solids	55,000 pounds
Building 130 PCB Storage Area	PCB-contaminated liquids and PCB liquids in containers or articles	6,600 gallons
	Drained PCB and PCB-Contaminated Articles	3,500 pounds
	PCB Debris/Solids	12,500 pounds

TCI must maintain updated PCB inventories to ensure that the maximum PCB storage inventories, above, are not exceeded.

DRAFT

TCI must maintain the PCB storage area to ensure that any cracks or wearing of the epoxy sealant are repaired as needed.

This letter serves as a Major Modification to the Approval. All other conditions of the April 27, 2018, TSCA PCB Commercial Storage Approval remain in effect.

This Modification is not effective until EPA has inspected the PCB storage areas after they are built to verify that they have been constructed consistent with the specifications in your Request for Modification dated March 2021, or if EPA is unable to travel to TCI's facility, TCI has provided other proof (photos etc.) of compliance with the specifications in the Request for Modification. TCI cannot operate the second storage area until EPA has provided written notification to TCI that it can operate the new storage area. Therefore, TCI must notify EPA when the PCB storage areas are complete so that arrangements may be made for EPA to inspect them. EPA reserves our right to suspend/revoke the 2018 Approval, in accordance with Condition I.B. of the Approval, if the storage areas are not in compliance with the regulations and not built to the specifications in the request for modification dated March 2021.

Modification of the April 27, 2018 Approval does not relieve TCI of the responsibility to comply with Toxic Substances Control Act (TSCA) and any and all applicable federal, state, and local laws, regulations or requirements. Furthermore, any violation of the terms and conditions of the Approval may be subject to enforcement action under Section 15 of TSCA.

If you have questions, please contact Lisa Graczyk, of my staff, at (312) 353-3219.

Sincerely,

Edward Nam
Director
Land, Chemicals and Redevelopment Division

cc: Susan Prout, EPA ORC
Lisa Graczyk, EPA LCD RTPS
Bradley Mitchell, OEPA
Cynthia M. Orms, Evergreen Services & Consulting, Inc.

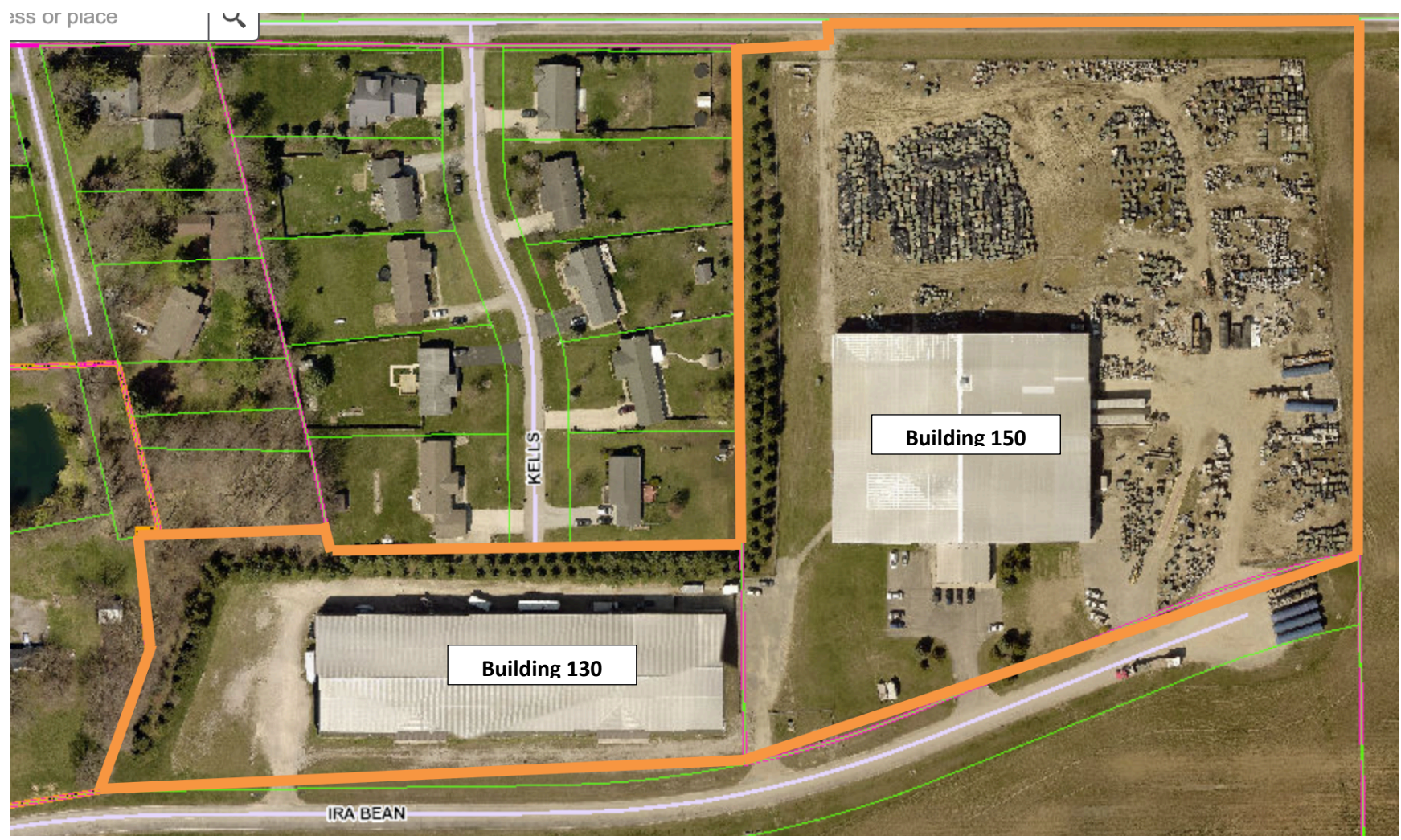
DRAFT

ATTACHMENT

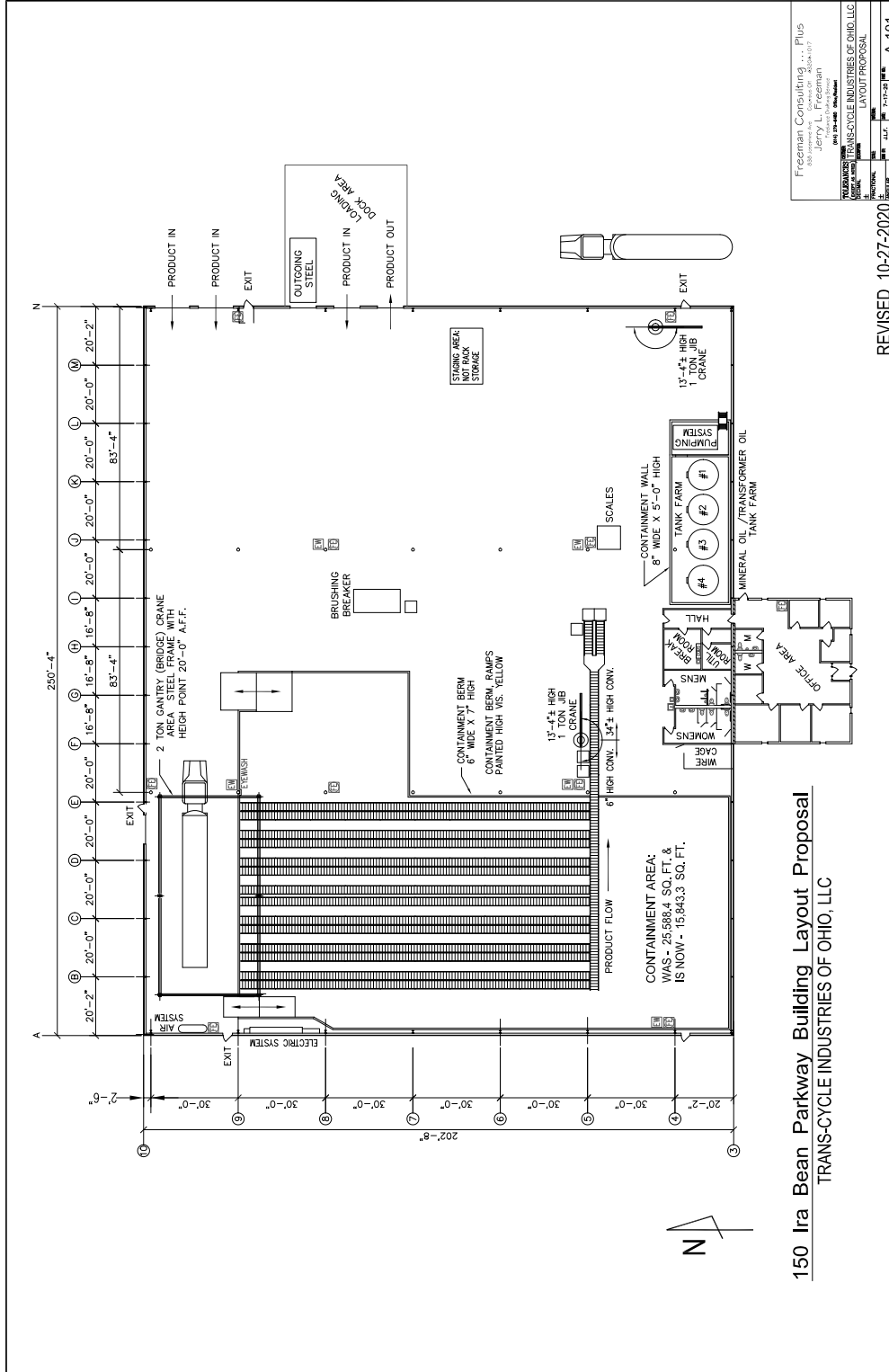
FIGURES

**FROM MARCH 2021
REQUEST FOR MODIFICATION
TO PCB COMMERCIAL STORAGE APPROVAL**

FIGURE 2
SITE PROPERTY MAP



**FIGURE 5
FACILITY LAYOUT – 150**



150 Ira Bean Parkway Building Layout Proposal
TRANS-CYCLE INDUSTRIES OF OHIO, LLC

Freeman Consulting, Inc. Plus 10000 Jerry L. Freeman 2018-01-08		DATE	2020-10-27	SCALE	A-101
TRANS-CYCLE INDUSTRIES OF OHIO, LLC		PROJECT	150	SHEET	7-11-20
LAYOUT PROPOSAL		REVISION			

REVISED 10-27-2020

**FIGURE 6
FACILITY LAYOUT – 130**

