



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

September 25, 2023

Lynn Fritz
Senior Account Executive
A-line TDS
1500 North Main Street
Tonkawa, Oklahoma 74653

RE: The United States Environmental Protection Agency (EPA) Region 6 Extension of Current Approval of A-Line TDS, Inc. and A-Line TDS Real Estate, LLC (“A-Line”) to Operate as a Commercial Storage Facility for Polychlorinated Biphenyls (PCBs) and Operation of its Metal Reclaim Furnace (MRF) and Chemical Dichlorination Process to Dispose of PCBs at its Facility Located in Tonkawa, OK; EPA ID OKD987087020

Dear Mr. Fritz:

The EPA is currently reviewing your renewal application and supplemental information submitted through September 2023 for compliance with 40 CFR 761.65 and 761.70, and in conjunction with EPA’s October 2019 “Guidance for Applicants Requesting to Treat/Dispose of PCBs using Incineration or an Alternative Method”. In addition, EPA is fulfilling its obligations under the Endangered Species Act and the National Historic Preservation Act.

We acknowledge receipt on September 17, 2023, of the scope and schedule for testing of the MRF; however, also needed is a testing plan in accordance with EPA’s 2019 “Guidance for Applicants Requesting To Treat/Dispose Of PCBs Using Incineration Or An Alternative Method” (<https://www.regulations.gov/document?D=EPA-HQ-OLEM-2018-0305-0010>). In addition, a demonstration test for the Chemical Dechlorination process is also needed. For the demonstration test, A-Line should conduct the dechlorination process in accordance with your Operator’s Guide and with the conditions in your current approval. The dechlorination process demonstration should take place concurrently with the MRF demonstration. The test plan for the MRF should include the dechlorination process demonstration. Please submit the test plan by November 1, 2023, for review and approval by EPA.

In order to complete its review, the EPA is continuing the extension of your current approval pursuant to regulations promulgated under section 6(e) of the Toxic Substances Control Act (TSCA) and codified in 40 CFR Parts 750 and 761. The EPA finds that continuing the extension of your current approval for operation of the commercial storage facility, MRF, and chemical dichlorination unit until June 30, 2024, does not present an unreasonable risk of injury to health or the environment. If you have questions or comments, please contact Harry Shah at (214) 665-6457 or shah.harry@epa.gov, or Tracie Donaldson at (214) 665-6633 or donaldson.tracie@epa.gov.

Sincerely,

 **MONICA SMITH** Digitally signed by MONICA SMITH
Date: 2023.09.25 12:53:10 -0500

Monica Smith
Acting Director

cc: Hillary Young (ODEQ)