



REGION 6

DALLAS, TX 75270

September 15, 2025

Mr. Lynn Fritz
Senior Account Executive
A-Line T.D.S., Inc.
1500 North Main Street
Tonkawa, Oklahoma 74653

RE: The United States Environmental Protection Agency Region 6 Extension of Current Approval of A-Line T.D.S., Inc. and A-Line T.D.S. Real Estate, LLC ("A-Line") to Operate as a Commercial Storage Facility for Polychlorinated Biphenyls (PCBs) and to Operate its Metal Recovery Furnace (MRF) and Chemical De-chlorination Unit to Dispose of PCBs at its Facility Located in Tonkawa, OK; EPA ID No. OKD987087020

Dear Mr. Fritz:

A-Line's current Toxic Substances Control Act authorization for storage and disposal of PCBs is expiring on September 30, 2025. As stated in the extension letter issued on December 30, 2024, A-line was required to conduct and complete their PCB Trial Burn and de-chlorination process demonstration by August 31, 2025. During the week of August 18, 2025, A-Line initiated the PCB Trial Burn of the MRF and the demonstration of the chemical de-chlorination process. EPA Region 6 and EPA Headquarters participated in the observation of both tests. The demonstration of the chemical de-chlorination process was completed, and A-Line submitted the results of the demonstration to the EPA. The EPA is currently reviewing these results. There were issues observed during the PCB Trial Burn of the MRF. On August 26, 2025, A-Line submitted a request to extend their TSCA authorization for the storage and disposal of PCBs from its original expiration date of September 30, 2025, to March 29, 2026. The EPA has reviewed A-Line's proposal to submit a revised Trial Burn Plan, which includes corrective action necessary to complete the PCB Trial Burn.

The EPA is extending A-Line's TSCA authorization provided A-Line fulfills the following requirements:

- By September 25, 2025, A-Line shall complete modifications on the MRF stack including but not limited to changing the sampling port locations. A-Line shall confirm compliance with EPA Method 1 requirements and demonstrate that cyclonic flow is not present at the sampling ports to be used for the PCB Trial Burn. A-line shall submit notice of modification, along with confirmation of Method 1 compliance, and cyclonic flow check report to EPA R6.
- By September 30, 2025, A-Line shall submit a revised Trial Burn Plan. Note that the previously

approved Trial Burn Plan conditions still apply except for the changes resulting from the corrective action on the sampling port locations and the updated test schedule.

- By September 30, 2025, A-Line shall submit the PCB storage and disposal re-authorization application. Note that operating conditions and limits as stated in the current TSCA approval for the MRF may change based on the PCB Trial Burn results.
- By November 7, 2025, A-Line shall complete the PCB Trial Burn for the MRF, which EPA will observe.
- By January 6, 2026, A-Line shall submit the final PCB Trial Burn report.

A-Line's current, authorized operating conditions for the de-chlorination unit are being set based on the demonstration conducted during the week of August 18, 2025. The total PCB concentration in the tank, for each of the three "batches" of Mineral Oil Dielectric Fluid (MODEF) treated during the demonstration was determined to be 127 ppm, and the PCB concentration in the oils ranged from 54-1913 ppm PCB. This extension letter, based on the information available to the EPA, authorizes the chemical de-chlorination unit to treat MODEF with a total PCB concentration no greater than 1,913 ppm total PCB (ASTM Method D4059) in any individual oil and with an average total PCB concentration (ASTM Method D4059) in the tank no greater than 127 ppm in each "batch." Oils with greater than 1913 ppm total PCB (ASTM Method D4059) will be sent off-site for disposal in a TSCA permitted hazardous waste incinerator. Each batch will be tested for PCB content prior to the start of processing using ASTM Method D4059. To obtain authorization to treat batches of MODEF with an average total PCB concentration greater than 127 ppm, in a batch, a demonstration is required. A-Line will be authorized to treat batches of MODEF at the total PCB concentration level demonstrated.

To allow for full consideration of your submitted information and any subsequent public participation, the EPA is continuing the extension of your current permit approval until March 29, 2026, pursuant to regulations promulgated under section 6(e) of the Toxic Substances Control Act and codified in 40 CFR Parts 750 and 761. This approval extension is granted to allow A-Line to complete the MRF PCB Trial Burn, submit the final Trial Burn report, and submit the application for renewal of authorization to commercially store and dispose of PCBs. The EPA finds that continuing the extension of your current approval for operation of the commercial storage facility, MRF, and chemical de-chlorination unit until March 29, 2026, does not present an unreasonable risk of injury to health or the environment.

If you have questions or comments, please contact Mr. Harry Shah at (214) 665-6457 or shah.harry@epa.gov.

Sincerely,

Eunice A. Varughese, Ph.D.
Director – Land, Chemicals & Redevelopment (LCRD) Division
U.S. EPA Region 6

cc: Ms. Hillary Young (ODEQ)