



REGION 9

SAN FRANCISCO, CA 94105

December 8, 2025

Shirrell Tingle, Regional Environmental Compliance Manager
Emerald Transformer Los Angeles LLC
5756 Alba Street
Los Angeles, CA 90058

**Re: Final TSCA PCB Commercial Storage Approval,
Emerald Transformer Los Angeles LLC, Los Angeles, California
EPA ID: CAD050806850**

Dear Shirrell Tingle:

Enclosed is the final Toxic Substances Control Act (TSCA) polychlorinated biphenyls (PCBs) commercial storage approval (Approval), issued under 40 C.F.R § 761.65, for Emerald Transformer Los Angeles LLC (Emerald Transformer) located at 5756 Alba Street in Los Angeles, California.

The United States Environmental Protection Agency (EPA) issued a Public Notice on the proposed Emerald Transformer Approval announcing a 30-day public comment period, which ended November 10, 2025. No public comments were received via email during the 30-day public comment period.

As requested by Emerald Transformer, EPA has finalized the Approval with a change to condition B.1(c) of the proposed Approval. Condition B.1(c) in the proposed Approval requires the PCB storage area to "use two coats of epoxy or a similar type of coating with different colors to ensure a continuous, smooth, non-porous surface." After the end of the public comment period, Emerald Transformer noted the PCB storage area currently has two coats of epoxy, but they are of the same color. Based on the deliberative process immediately following the completion of the public comment period, EPA has determined that coating the concrete floor with two coats of epoxy paint to minimize or prevent PCBs from migrating into the concrete floor in case of a release of liquid PCBs, is sufficient without need for two different colors. The quarterly wipe sampling and visual inspection of the two-coat epoxy coating in the PCB storage area will ensure the commercial storage of PCBs will not pose an unreasonable risk of injury to health or the environment. Therefore, EPA changed condition B.1(c) in the final approval by removing the phrase "with different colors." This change to condition B.1(c) is consistent with 40 CFR 761.65(d)(4)(iv) as well as with the previous 2013 approval.

December 8, 2025

It is the responsibility of you and your company, Emerald Transformer, to ensure that all applicable provisions of TSCA and the federal PCB regulations are followed. Violation of any of the applicable provisions may be cause for rescission of this approval. Furthermore, this approval does not relieve Emerald Transformer of the responsibility to comply with all other federal, state and local regulations and ordinances for transportation, siting, operation, and maintenance of its facility.

EPA reserves the right for its authorized representatives to observe Emerald Transformer storage activities and inspect records that the company is required to maintain under the federal PCB regulations and this approval, during normal operation and at other reasonable times.

If you have any questions concerning the final federal TSCA approval, please contact Sean Goral of my staff at 415-972-3163 or goral.sean@epa.gov.

Sincerely,

/s/ 12/08/2025

Claire Trombadore, Director
Land Chemicals, and Redevelopment Division

cc: Sean Goral, EPA R9, Permits Section
Ed Coral, EPA R9 Office of Regional Counsel
Hai-Yong Kang, California Department of Toxic Substances Control

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**REGION 9****75 Hawthorne Street****San Francisco, California 94105**

In The Matter Of:)	
)	
Emerald Transformer Los Angeles LLC)	Final
5756 Alba Street)	Approval to Commercially
Los Angeles, California 90058)	Store Polychlorinated Biphenyl Waste
EPA ID # CAD050806850)	

AUTHORITY

This Approval to commercially store Polychlorinated Biphenyls (“PCB”) waste is issued pursuant to Section 6(e)(1) of the Toxic Substances Control Act (“TSCA”), 15 U.S.C. § 2605(e)(1), and 40 Code of Federal Regulations (“CFR”) Part 761, “Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions”.

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BACKGROUND

Emerald Transformer Los Angeles LLC (“Emerald Transformer”) owns and operates a facility located at 5756 Alba Street in Los Angeles, California, at which it functions as a commercial storer of PCB waste (as defined in 40 CFR § 761.3) engaged in storage activities requiring EPA approval. The Emerald Transformer facility receives and processes out of service transformers and other sources of PCB waste. As part of that process, Emerald Transformer commercially stores PCBs and PCB Items and drains and repackages PCB liquids, in the event that the primary container or PCB Item is compromised. The facility also has an on-site laboratory.

Clean Harbors Los Angeles, LLC acquired the Facility in 2002. Around 2017, Clean Harbors Los Angeles, LLC’s parent company, Clean Harbors Inc., was sold to Emerald Transformer, including the subsidiary running the Facility. Clean Harbors Los Angeles LLC subsequently changed its name to Emerald Transformer Los Angeles LLC in 2018. The current

owner and operator of the Facility, Emerald Transformer Los Angeles LLC, is a subsidiary of Emerald Transformer Western States LLC.

PCB Approval (Permitting) History

The Facility was initially authorized by EPA to store PCBs in 1991 (amended on December 19, 1991, and May 5, 1994) and subsequent approvals were issued in 1997, and 2013 that approved PCB storage locations (“TSCA Unit(s)”) within the Facility. The commercial storage approval issued by EPA on October 24, 2013, to Clean Harbors Los Angeles LLC revised the maximum storage capacity to 7,920 gallons and covered the interim closure of Containment Bay E (For location of Containment Bay E, see Figure 3). On May 15, 2018, the U.S EPA Approved a Class 1 Permit modification requested by Emerald Transformer that included a name change from Clean Harbors Los Angeles LLC to Emerald Transformer Los Angeles LLC.

On May 2, 2025, Emerald Transformer applied for renewal of its PCB waste commercial storage approval. The renewal application submitted on May 2, 2025, is the subject document reviewed for the issuance of this Approval.

Facility’s Waste Operations under State and Local Permits

The Facility has a 2022 RCRA permit issued by Department of Toxic Substances Control (“DTSC”), approving a Part B Application issued 29 September 2020, as revised 29 April 2022 (Rev 4) (“Part B Application”), to manage hazardous waste (“RCRA Permit”). The Facility is categorized as a large treatment and storage facility for purposes of the State’s RCRA program: Specifically, the RCRA Permit states “The Facility is categorized as a large treatment facility pursuant to Health and Safety Code section 25205.1 and for purposes of Health and Safety Code sections 25205.2 and 25205.19.”

The Facility accepts hazardous and non-hazardous waste including RCRA-regulated and California-only regulated (non-RCRA) hazardous waste, and non-hazardous wastes, governed by the RCRA Permit.

The Facility is authorized to discharge industrial wastewater through an approved point of discharge in accordance with the discharge limitations, conditions, and requirements of an Industrial Wastewater Permit, Permit No. W-554526 (“WW Permit”), issued by the City of Los Angeles, LA Sanitation and Environment on February 2, 2024.

APPLICABLE REGULATIONS

This Approval incorporates, and is issued in accordance with, applicable requirements of the PCB Regulations at 40 CFR Part 761. The rules applicable to the storage for disposal of PCBs at concentrations of 50 ppm or greater and PCB Items with PCB concentrations of 50 ppm or greater are codified at 40 CFR § 761.65, “Storage for disposal.” The PCB Regulations require, among other things, that commercial storers of PCB waste, storing certain TSCA-regulated PCB-containing material, obtain a written approval issued by the Regional Administrator for the region in which the storage facility is located. On October 10, 2014, the authority of the Regional

Administrator was delegated to the Director, Land Division, Region 9 by U.S. EPA Delegation Order R9-12-5. On May 5, 2020, those delegations to the Director, Land Division were redelegated to the Director, Land, Chemicals, and Redevelopment Division (LCRD) with U.S. EPA Region 9 Organizational Realignment General Redelegation of Authority.

FINDINGS

Upon review of the Emerald Transformer Application, EPA has determined that the criteria for approval to engage in the commercial storage of PCB waste set forth in 40 CFR § 761.65(d) have been met. Specifically, the Application demonstrates that Emerald Transformer's storage facility, storage capacity, employee qualifications, closure plan, and financial assurance for closure satisfy applicable requirements and that operation of the storage facility, when conducted in accordance with the conditions of this Approval and all applicable provisions of the PCB regulations, will not pose an unreasonable risk of injury to health or the environment.

EFFECTIVE DATE

This Approval shall become effective upon signature and shall expire ten (10) years from such date, unless suspended, revoked or terminated, or administratively continued, in accordance with the conditions of this Approval, or unless otherwise authorized under applicable law.

DEFINITIONS

All the terms and abbreviations used in this Approval shall have the meanings as defined in 40 CFR § 761.3 unless the context clearly indicates otherwise or unless the term is defined below for the purposes of this Approval.

“Approval” means the content of this document, the conditions within, and any subsequent EPA-approved written modifications thereto.

“Application” and “Emerald Transformer Application” mean all data and materials upon which EPA based its decision to approve Emerald Transformer's request for approval to commercially store PCBs and PCB Items, e.g. information submitted to EPA by Emerald Transformer to define, represent, or describe Emerald Transformer's commercial storage operations. This includes Emerald Transformer's May 2, 2025 renewal application and any subsequent Emerald Transformer application that EPA approves in writing as a modification to this Approval.

“CFR” means the Code of Federal Regulations.

“Day” means a calendar day, unless otherwise specified.

“Delegate” means the Director, Land, Chemicals and Redevelopment Division, EPA Region 9.

“Director of LCRD” means the Director of the Land, Chemicals and Redevelopment Division, EPA, Region 9. Phone Number: 415-972-3013 Mailing Address: US EPA Region 9, 75 Hawthorne St. San Francisco, CA 94105.

“Electrical equipment” means site-specific equipment identified in Emerald Transformer’s Application.

“EPA” means the United States Environmental Protection Agency, Region 9.

“Emerald Transformer” means Emerald Transformer Los Angeles LLC, the company which owns and operates the PCB waste commercial storage facility located at 5756 Alba Street in Los Angeles, California, and which is approved to commercially store PCB waste under this Approval.

“Emerald Transformer Facility” and “Facility” mean all contiguous land and improvements on the land and all structures and other appurtenances of the PCB waste commercial storage facility located at 5756 Alba Street in Los Angeles, California.

“Footprint” means the area of the storage area floor space taken up by electrical equipment or PCB capacitors.

“Major modification” means any change which will affect overall Facility performance or environmental impact, including but not limited to changes to the storage areas, the maximum PCB storage inventory, the closure plan, closure cost estimates (except as required for inflation adjustment), and the financial assurance for closure.

“Minor modification” means any change which will not affect overall Facility performance or environmental impact including but not limited to an administrative or informational change, and correction to typographical errors.

“PCB” means polychlorinated biphenyl(s).

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

“Project Manager” means the EPA lead staff person assigned to the Approval in the Permits Office, Region 9.

“Regional Administrator” means the Regional Administrator, Region 9.

“Spill” has the same meaning as defined in EPA's PCB Spill Cleanup Policy in 40 CFR § 761.123.

“SPCC Plan” is the Spill Prevention, Control, and Countermeasure Plan prepared in accordance with 40 CFR part 112.

“Storage area” or “PCB storage area” means any storage area listed in Condition B.1(a).

CONDITIONS OF APPROVAL

A. General Conditions

1. Approval Compliance

(a) Emerald Transformer must operate its Facility in compliance with the conditions of this Approval and consistent with the information included in Emerald Transformer's Application. Noncompliance with any provision of the Emerald Transformer Application and/or any condition of this Approval shall be deemed a violation of this Approval and may subject Emerald Transformer to civil or criminal enforcement action and associated penalties.

(b) This Approval supersedes all previous Approvals for the commercial storage of PCB waste at the Facility issued by EPA to Emerald Transformer.

(c) Emerald Transformer must comply and operate the Facility in accordance with Section 6(e) of TSCA, 15 U.S.C § 2605(e), and the PCB Regulations, including the requirements of the "PCB Spill Cleanup Policy" codified at 40 CFR Part 761, Subpart G.

(d) This Approval is based on the facts, representations, and certifications made by Emerald Transformer in its Application. In the event that the conditions of this Approval are inconsistent with the provisions of, or information contained in the Emerald Transformer Application or supporting documentation, Emerald Transformer must comply with the conditions of this Approval.

(e) Emerald Transformer is liable for the actions of its employees, agents, contractors, and subcontractors in the operation of the Facility.

(f) Failure to comply with any of the Approval conditions shall constitute a violation of the requirement in 40 CFR § 761.50(a) to store or dispose of PCB waste in accordance with 40 CFR Part 761, Subpart D. A violation of the PCB Regulations is a prohibited act under Section 15 of TSCA.

(g) Compliance with this Approval does not relieve Emerald Transformer of the responsibility to comply with all other applicable federal, state, and local laws and regulations, including the PCB Regulations. Emerald Transformer should not rely solely on this Approval for all requirements related to PCBs or the storage of PCB waste.

2. Duty to Report Noncompliance

(a) If at any time Emerald Transformer becomes aware that it is operating the Facility in a manner that is not in compliance with this Approval or other applicable provisions of the PCB Regulations, Emerald Transformer shall notify the Director of LCRD and EPA Project Manager within 24 hours and shall submit a written report to the Director of LCRD and provide a copy to the EPA Project Manager and R9LandSubmit@epa.gov describing the noncompliance within five (5) calendar days.

3. EPA Modification, Suspension, Revocation and Termination of Approval

- (a) EPA reserves the right to modify, suspend, revoke, or terminate this Approval:
 - (i) If Emerald Transformer fails to operate the Facility in compliance with this Approval;
 - (ii) If there is reason to believe that continued operation of the Facility presents an unreasonable risk of injury to health or the environment, or if new regulations or standards become applicable rendering such modification, suspension, revocation, or termination appropriate. Upon request, Emerald Transformer shall provide information EPA deems necessary to determine whether cause exists for modification, suspension, revocation or termination of this Approval. Emerald Transformer shall provide such information within the time frame specified in EPA's request, or if no time frame is specified, within fifteen (15) calendar days of EPA's request unless impracticable;
 - (iii) Upon discovering misrepresentation(s) or omission(s) of material fact(s) in the Emerald Transformer Application; or
 - (iv) For environmental civil violations committed by or criminal convictions of Emerald Transformer, its principles or key employees.
- (b) EPA's right to modify, suspend, revoke, or terminate this Approval does not in any way preclude its right to commence appropriate enforcement action under any or all applicable statutes and regulations. EPA reserves any rights and remedies available to it under TSCA, the PCB Regulations, and any other Federal laws or regulations for which EPA has jurisdiction, to enforce the provisions of this Approval.

4. Application and Approval Modifications

- (a) Emerald Transformer must submit an application and receive written EPA approval for any modification to the Emerald Transformer Application or to this Approval. Emerald Transformer must not implement any such modifications until it receives written EPA consent.
- (b) Minor modifications to the Emerald Transformer Application or to this Approval shall be submitted to Director of LCRD and shall be implemented only after receipt of written consent.
- (c) Major modifications to the Emerald Transformer Application or to this Approval shall be submitted to the Director of LCRD and shall be implemented only after receipt of written consent.

5. Approval Expiration/Renewal

- (a) This Approval shall expire 10 years from the date of issuance of this Approval. This Approval and its conditions herein will remain in effect beyond the Approval

expiration date if a complete renewal application is received within the time period specified in Condition A.5(b) and EPA has determined in writing that the application is complete.

(b) To continue the commercial storage of PCBs and PCB Items granted by this Approval after the expiration date of this Approval, Emerald Transformer shall submit a complete renewal application at least 180 days, but not more than 270 days prior to the expiration date of this Approval. A complete renewal application must contain, at a minimum, information listed in 40 CFR § 761.65(d)(3). A complete renewal application is considered to be information submitted in the most recently approved application, with appropriate modifications or updates based on proposed revisions to the original approval, which may include design and operation changes, updated safety protocols, and revised operating and testing procedures. The EPA may require Emerald Transformer to submit additional information to support the renewal of this Approval. If Emerald Transformer submits this information to EPA at least 180 days prior to the expiration date of this approval, and EPA has determined in writing that the application is complete, this approval continues in force (i.e., does not expire) until EPA issues an approval renewal, a conditional approval renewal, or an approval request denial.

(c) If Emerald Transformer does not submit a complete renewal application at least 180 days prior to the expiration date of this Approval, this Approval will expire as specified in Condition A.5(a). Failure to submit a renewal application as described in Condition A.5(b) will be treated as evidence of Emerald Transformer's intent to close.

6. Entry and Inspection

(a) Emerald Transformer shall allow, at reasonable times, EPA authorized representative(s) to conduct inspections for the purpose of determining compliance with this Approval. Such inspection activities may include, but are not limited to, permitting EPA authorized representative(s) to:

- (i) conduct interviews;
- (ii) inspect and/or collect copies of records and monitoring data;
- (iii) take sample(s); and
- (iv) inspect, observe and document Emerald Transformer's activities, equipment, work practices, operations and processes.

(b) Any refusal by Emerald Transformer to allow access to the Facility during such regular business hours, or refusal to provide requested copies of records, shall be deemed a violation of this Approval.

7. Change in Ownership or Operational Control

(a) Emerald Transformer shall notify the Director of LCRD in writing at least 90 days before it intends to transfer ownership or operational control of the Facility. This

notification shall include the name, address, and telephone number of the intended transferee. Along with such notification, Emerald Transformer shall submit an application to modify the Emerald Transformer Application providing the information required in all applicable provisions of 40 CFR § 761.65(d)(3), along with a notarized affidavit signed by the intended transferee stating that it will abide by all conditions of the Application, including the proposed modifications submitted in connection with the intended transfer of ownership or operation.

(b) After receiving Emerald Transformer's notification and application to modify the Application, the intended transferee's affidavit, evidence that the intended transferee has established financial assurance for closure pursuant to 40 CFR § 761.65(g) (if applicable), and other documents EPA may require under 40 CFR § 761.65(j)(2), EPA may either:

(i) Modify the approval to substitute the transferee's name for Emerald Transformer and make other conforming minor modifications, or

(ii) Require the intended transferee to submit a new application and/or apply for a new approval.

(c) The intended transferee shall not operate the Facility until the Director of LCRD issues an approval in the transferee's name.

(d) Emerald Transformer must maintain its financial assurance for closure for the Facility until the intended transferee has established financial assurance for closure of the Facility pursuant to 40 CFR § 761.65(g) and EPA issues an approval in the transferee's name.

(e) EPA may revoke, suspend, and/or modify this Approval or the transferee's new approval if, following a change in ownership or operational control at the Facility, there is a change in the Facility's operations and EPA finds that this Approval or the transferee's new approval will not prevent unreasonable risk of injury to health or the environment.

(f) The filing of a request to transfer ownership and/or operational control of the Facility does not stay the applicability or enforceability of any Approval condition.

8. Transformers and Other Electrical Equipment

If the PCB concentration of any transformer, or dielectric fluid within any transformer, received by Emerald Transformer is not known at the time of receipt, Emerald Transformer must treat the transformer as a PCB Transformer, (dielectric fluid is 500 ppm or greater PCBs) until testing proves otherwise.

9. Bankruptcy

Emerald Transformer must notify EPA within thirty (30) days of filing for bankruptcy so that EPA may ensure compliance with the requirements of this Approval, including the

maintenance of adequate financial assurance, and ensure that ongoing Facility operations will not pose unreasonable risk of injury to health or the environment.

10. Change in Flood Plain Designation

Emerald Transformer must submit a written notification to the Director of LCRD and provide a copy to the EPA Project Manager and R9LandSubmit@epa.gov, immediately upon redesignation of the Facility within a 100-year flood plain. EPA may modify, suspend, revoke, or terminate this Approval if EPA determines that the change in flood plain designation, or any change in Facility operations resulting from or associated with such change in flood plain designation, may pose unreasonable risk of injury to health or the environment.

11. Severability

If any part or condition of this Approval is found to be invalid by any court of competent jurisdiction, all of the other provisions of this Approval shall remain in full force and effect.

B. PCB Storage Management

1. PCB Storage Area

(a) Emerald Transformer's approved PCB storage area is described below and is depicted in "Attachment A". These PCB storage areas shall be maintained in compliance with 40 CFR § 761.65 and the Emerald Transformer Application.

(i) "TSCA PCB Storage Area (Bay 1)": 54 feet long x 34 feet wide by 6 inches high; concrete floor and curbing.

(b) Storage of PCBs or PCB Items in an area other than the approved storage areas described above shall be deemed a violation of this Approval.

(c) The floor and curbing shall be constructed of Portland cement, concrete or a continuous, smooth and non-porous material. Emerald Transformer shall maintain the floor and curbs so as to prevent any cracks, gaps or other opening and use two coats of epoxy or a similar type of coating to ensure a continuous, smooth, non-porous surface.

C. Maximum Storage Capacities

1. Maximum Storage Capacities for PCBs and PCB Items

(a) The maximum storage capacity ("MSC") and the categories of PCBs and PCB Items permitted to be stored at any time in each approved storage area are specified below. Emerald Transformer's ability to store PCBs and PCB Items at the Facility is limited to the categories and quantities specified below for the PCB storage area. Emerald Transformer shall not accept or store any PCBs or PCB Items which have not been

described below or quantities in excess of those listed below, unless otherwise approved by EPA in writing on a case-by-case basis.

- (i) “TSCA PCB Storage Area (Bay 1)”: The maximum PCB storage capacity and the maximum PCB storage inventory are the same volume of 7,920 gallons. This corresponds to the equivalent of 144 55-gallon equivalent containers. Items other than 55 gallons in size may be accepted for storage, but maximum internal liquid volume in storage at any one time will not exceed 7,920 gallons.

2. Storage Requirements for PCBs and PCB Items

- (a) Intact and non-leaking PCB Equipment and other PCB Articles, whether drained or filled, shall be stored free-standing or in PCB Article Containers.
- (b) Partially or fully disassembled drained PCB-containing electrical equipment and other PCB Articles shall be stored free-standing, or in PCB Containers.
- (c) Leaking PCB Articles and PCB Equipment shall be stored in PCB Containers.
- (d) Liquid PCBs shall be stored in PCB Containers, dedicated stationary storage containers (tanks), or intact and non-leaking PCB Articles.
- (e) Non-liquid PCBs shall be stored in PCB Containers.

3. PCB Waste Storage Container Requirements

- (a) Stationary storage containers (tanks) used to store PCB liquids shall comply with the requirements of 40 CFR. § 761.65(c)(7).
- (b) Containers used to store liquid or non-liquid PCB waste shall comply with the requirements of 40 CFR § 761.65(c)(6).
- (c) Emerald Transformer’s use of a PCB waste storage container that does not comply with any of the requirements described above shall be deemed a violation of this Approval.
- (d) Any container used for storage of liquid or non-liquid PCBs shall meet the Department of Transportation requirements described in 49 CFR. Parts 171 through 180.

4. PCB Storage, Marking, and Labeling

- (a) Emerald Transformer shall label all PCB Containers, PCB storage areas, and any PCB Item subject to marking requirements under 40 CFR § 761.40 with the ML label defined in 40 CFR § 761.45.
- (b) Emerald Transformer shall place a label on all PCB Items with the date of removal from service for disposal. Storage shall be managed so that PCB items can be

located by this date. All storage containers shall have a record that includes for each batch of PCBs the quantity of the batch and date the batch was added to the container. The record shall also include the date, quantity, and disposition of any batch of PCBs removed from the container.

(c) Emerald Transformer shall dispose of all PCBs and PCB Items within one (1) year after they are taken out of service. If additional time is required for disposal, Emerald Transformer shall comply with the requirements of 40 CFR § 761.65(a)(2) and (3).

5. Storage Requirements for PCBs and PCB Items

(a) Drums containing PCBs and PCB Items shall not be stacked in a manner that could result in a spill outside the storage areas. Drums shall not be stacked more than two (2) drums high.

(b) An aisle width of two (2) feet, minimally, must be maintained to allow for unobstructed access to all PCBs and PCB Items stored on-site by personnel, fire protection equipment, and decontamination equipment.

(c) Emerald Transformer may store PCBs and PCB Items in a manner that allows maximum use of space. However, PCBs and PCB Items must be stored in a manner that presents no unreasonable risk of injury to health and the environment and that does not impede routine inspections carried out by Emerald Transformer as required by this Approval. During inspections conducted by EPA authorized representative(s), Emerald Transformer shall move items as requested by the inspector(s) to allow the inspector(s) full access to the Facility and stored PCBs and PCB Items.

(d) Access to the PCB storage areas shall be restricted to workers that have completed training in accordance with Condition E.4. and that are listed on the signature sheet described in Condition H.3(e), except that workers that are working for or on behalf of Emerald Transformer as of the effective date of this Approval that have been trained under previous versions of the Emerald Transformer training manual shall be allowed access to the PCB storage areas for up to sixty (60) days after the effective date of this Approval in order to complete the training described in Condition E.4.

(e) Emerald Transformer must document the PCB content of all incoming inventory to establish compliance with the conditions of this Approval at all times. Sampling and analytical methods must comply with applicable provisions of the PCB Regulation.

(f) If any PCB Container, PCB Article, PCB Article Container, or PCB Equipment is leaking, Emerald Transformer shall immediately transfer the PCB Container, PCB Article, PCB Article Container, or PCB Equipment and the PCB waste therein to a properly marked, non-leaking container. Any spilled or leaked materials shall immediately be cleaned up and the materials containing PCBs shall be disposed of in accordance with applicable provisions of the PCB Regulation and Condition F.4.

- (g) No item of movable equipment that is used for handling PCBs and PCB Items in the storage areas and that comes in direct contact with PCBs shall be removed from the storage area unless it has been decontaminated as specified in 40 CFR § 761.79.
- (h) PCB Containers must always be closed during storage, except when adding and removing their contents, and must not be opened, handled or stored in a manner which may cause damage or leaks.
- (i) Emerald Transformer shall operate and maintain a database and barcode system to track the volumes and locations of all PCB wastes throughout the Facility.
- (j) Emerald Transformer shall store and move PCB items in a manner that does not compromise the epoxy coating on the floor.
- (k) Emerald Transformer shall not accept or store PCB/radioactive waste as defined in 40 CFR. § 761.3.
- (l) Emerald Transformer shall conduct all draining operations within the bermed and sealed containment area of the PCB storage area.
- (m) Emerald Transformer shall send liquid PCB wastes, including liquids produced at Emerald Transformer during any PCB waste draining or flushing activities, to an incinerator approved by EPA under 40 CFR. § 761.70. The sole exception to this condition is that Emerald Transformer may dispose of small capacitors in accordance with 40 CFR. § 761.60(b)(2)(ii).

6. Storage Area Inspection Requirements

- (a) PCBs and PCB Items in storage shall be checked for leaks and spills on a weekly basis. Emerald Transformer need not document the weekly inspections; however, any spills discovered during these routine inspections shall be cleaned up expeditiously, as specified in Condition C.6(c) and reported if required by Condition F.3. Records of cleanup and disposal must be maintained in accordance with Condition H.3(c).
- (b) At least once every thirty (30) days, as required by §761.65(c)(5), Emerald Transformer shall conduct a thorough inspection of the PCB storage area at the Facility. The following elements shall be included in the 30-day inspections:
 - (i) PCBs and PCB Items in storage shall be checked for leaks and spills;
 - (ii) The PCB Containers, PCB Article Containers, PCB Equipment, and PCB waste, and ancillary equipment (vacuums, pumps, etc.,) shall be checked for leaks;
 - (iii) The condition of PCB liquid and spent solvent storage tank shells, tank supports, and tank area curbing shall be checked for cracks, leaks or deterioration;

- (iv) The condition of the floor, joints and curbing in the PCB storage area shall be checked;
 - (v) Spill response and emergency equipment as described in the Spill Prevention, Control, and Countermeasure (SPCC) Plan (Appendix D of the Application) shall be checked and replaced or replenished as necessary;
 - (vi) Inspections of the epoxy coating to identify any areas that would allow penetration of PCBs. The inspections and any follow-up actions shall be documented in the Facility records;
 - (vii) Identify any areas that may allow animals to gain access to the Facility. The inspections and any follow-up actions shall be documented in the Facility records.
- (c) PCBs or PCB Items found leaking shall be transferred to a properly marked non-leaking container. Any spilled or leaked materials shall immediately be cleaned up and the materials containing PCBs shall be disposed of in accordance with applicable provisions of the PCB Regulations and Condition F.4.
- (d) Any needed repairs, including those for leaks, cracks, deterioration, or malfunctioning vents, alarms or indicator levels detected during such inspections, shall be made as expeditiously as possible.
- (e) Emerald Transformer must conduct random quarterly sampling of the PCB storage area, in accordance with the Facility SOP on Wipe Sampling (Appendix L of the Application). If wipe samples show PCB concentrations greater than 10 ug/100 cm², Emerald Transformer must fully delineate the extent of PCB contamination and initiate the cleanup process. All sampling procedures, reporting of results, and any follow-up cleanup must be conducted in accordance with Appendix L of the Application.
- (f) Emerald Transformer must conduct a quarterly visual inspection of the epoxy floor coating and include the results in the quarterly sampling report. Emerald Transformer must include in the quarter sampling report a description, with photographs, of any damage to the epoxy coating in the PCB storage area and if any repairs undertaken.

D. Facility Operation, Limitation of Exposure and Control of Releases

1. Emerald Transformer shall maintain and operate the Facility to prevent fire, explosion, releases of PCBs to the environment, and exposure of workers of PCBs.
2. Emerald Transformer shall conduct all PCB related work at the Facility in accordance with the regulations and guidelines contained in:
 - (a) OSHA Title 29 CFR. § 1910 "Safety and Health Regulations for General Industry;"
 - (b) OSHA Title 29 CFR. § 1926 "Safety and Health Regulations for Construction;" and

(c) OSHA Title 29 CFR. § 1926.65 “Hazardous Waste Operations and Emergency Response.”

3. Emerald Transformer shall operate and maintain the security systems at the Facility to prevent unauthorized access of the Facility at all times, in accordance with the SPCC Plan (Appendix D of the Application).
4. Emerald Transformer shall implement exclusion techniques to prevent animals from entering or nesting within Container Storage Warehouse and inspect the warehouse monthly to verify these techniques are effective.
5. Emerald Transformer shall move any PCB waste from the loading/unloading area into the Container Storage Warehouse within one (1) day from receive date.

E. Worker Protection

1. Emerald Transformer workers with access to PCB storage area shall wear or use protective clothing or equipment at the Facility to protect against dermal contact with or inhalation of PCBs or material containing PCBs.
2. Emerald Transformer shall comply with all applicable health and safety standards, as required by federal, state and local regulations and ordinances.
3. Emerald Transformer shall comply with the safety provisions of the Emerald Transformer Application.
4. All employees hired subsequent to the date of this Approval must be trained, as specified in Emerald Transformer's personnel training program and training schedule included in the Application. In addition, Emerald Transformer must ensure that personnel who are directly involved with handling PCBs and PCB Items are familiar with the requirements of this Approval, and the regulatory requirements under 40 CFR Part 761.
5. All new workers must complete training in accordance with the Emerald Transformer training manual prior to entering PCB storage areas. In addition to initial training, all workers with access to PCB storage areas must complete annual refresher training in accordance with the current Emerald Transformer training manual.
6. Except as provided in Condition E.7, the PCB concentration of non-porous surface areas located outside of PCB storage areas shall not exceed $10 \mu\text{g}/100 \text{ cm}^2$ and all porous surface located outside of PCB storage areas shall not exceed 1 ppm.
7. The PCB concentration of food handling areas, including any locations where food or drink is prepared, stored or consumed shall not exceed concentration of $1 \mu\text{g}/100 \text{ cm}^2$ for non-porous surfaces and 1 ppm for porous surfaces.
8. Any person entering and leaving the PCB storage area must do so through a clean-in/clean-out station.

9. The PCB concentration of non-porous surface areas located in the clean-in/clean-out station shall not exceed 10 µg /100 cm² and all porous surface located in the clean-in/clean-out station shall not exceed 1 ppm.
10. In the event the concentration of PCBs exceeds the levels set forth in Conditions E.156, E.7, and E.9, Emerald Transformer shall immediately begin decontamination of the affected area in accordance with applicable requirements of the PCB Regulations and this Approval. Emerald Transformer shall not encapsulate any PCB-containing areas regardless of PCB concentration levels without specific prior written approval from EPA.
11. Emerald Transformer must report incidences of injury or illness from exposure to PCB to the Director of LCRD and the EPA Project Manager within twenty-four (24) hours of becoming aware of such injury or illness.
12. Emerald Transformer employees shall complete and renew annually the appropriate OSHA/HAZWOPER training program (8 hours for non-hazardous waste operations employees, 24 hours for hazardous waste operations employees, and 40 hours for hazardous waste emergency response employees).

F. PCB Spills and Releases

1. Emerald Transformer has prepared and submitted a SPCC Plan (Appendix D of the Application). Emerald Transformer shall follow the spill prevention measures outlined in the SPCC Plan and implement applicable control measures specified in the SPCC Plan for qualifying spill events.
2. Spills of PCBs shall be cleaned up in accordance with the requirements of the PCB Spill Cleanup Policy at 40 CFR Part 761, Subpart G or the PCB Regulations, as applicable.
3. Emerald Transformer shall comply with applicable PCB spill reporting requirements under 40 CFR § 761.125; the Clean Water Act; and the Comprehensive Environmental Response Compensation and Liability Act. Notification to the EPA Regional Office of any PCB spill or release as required under 40 CFR § 761.125 shall be made to Director of LCRD and the EPA Project Manager. A written report of the reportable spill incident under 40 CFR § 761.125 must be submitted to Director of LCRD within five (5) business days following the incident. Provide a copy of the notification and written report to the EPA Project Manager and R9LandSubmit@epa.gov.
4. Any wastes generated as a result of cleanup of a PCB spill or release or decontamination of any material contaminated by a PCB spill or release shall be disposed of in accordance with 40 CFR § 761.61.
5. Emerald Transformer shall immediately report to Director of LCRD and the EPA Project Manager if, as a result of any unauthorized entry or operation at the Facility, PCBs were released. To the extent known, such report shall include a description of the unauthorized entry or operation, the resulting release of PCBs, and any corrective action taken by Emerald Transformer. Examples of unauthorized entry or operation at the Facility to be

reported to EPA include, but are not limited to, tampering, destruction, or loss at the Facility which caused the release of PCBs.

6. In the event that Emerald Transformer believes, or has reason to believe, that quantities of PCBs equal to or greater than one (1) pound by weight in any 24-hour period have been released into the environment as a result of Facility operations, Emerald Transformer shall immediately notify the National Emergency Response Center by telephone at (800) 424-8802 within 24 hours after discovery and the EPA Project Manager. A full investigation into the cause of the incident and a detailed report shall be included in the daily operation records. A copy of this report describing the incident shall be submitted to the EPA Project Manager within 15 days after the incident.
7. In the event of a release, fire, or explosion that requires external emergency response, Emerald Transformer shall immediately notify emergency responders about the presence of PCB waste at the Facility. This notification shall include information about the location, approximate quantity, and current condition of the PCB waste, as well as the toxicity hazards associated with PCBs.
8. Emerald Transformer shall report to EPA any incident requiring implementation of the SPCC Plan (Appendix D of the Application). Notification shall be made to the EPA Project Manager and:

Permits Office Manager (LND 4-2)
Land, Chemicals & Redevelopment Division
U.S. Environmental Protection Agency - Region 9
(415) 972-3831

The notification shall occur as soon as possible after Emerald Transformer becomes aware of the incident, but no later than 24 hours after the incident.

9. Emerald Transformer shall submit a written report to EPA that provides details on any incident requiring implementation of the SPCC Plan (Appendix D of the Application). The written report shall be submitted to the EPA Project Manager. The written report shall be submitted to EPA within 15 days of the incident and include, at a minimum, the following information:
 - (a) Date, time, and type of incident (e.g., fire, explosion, chemical release);
 - (b) Name and quantity of material(s) involved;
 - (c) The extent of injuries, if any;
 - (d) Response actions taken;
 - (e) An assessment of actual or potential hazards to human health or the environment, where this is applicable;
 - (f) Estimated quantity and disposition of recovered material that resulted from the incident; and
 - (g) Steps taken to prevent reoccurrence.

G. Emergency Provisions

1. Emerald Transformer shall follow the SPCC Plan whenever there is a fire, explosion, or release of PCBs or hazardous constituents.
2. Copies of the updated Emerald Transformer training manual, SPCC Plan, and this Approval shall be maintained and be made available to all workers at the Emerald Transformer Facility. Lists of emergency contacts, telephone numbers, and emergency exit routes shall be posted in prominent locations throughout the Facility.
3. The Facility shall, at a minimum, be equipped with the following:
 - (a) an internal communications or alarm system capable of providing immediate emergency notification (voice or signal) to facility personnel;
 - (b) devices, such as a telephone or a hand-held two-way radio, which are immediately available at the scene of operations, capable of summoning emergency assistance from local police departments, fire departments, and State or local emergency response teams;
 - (c) portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and
 - (d) water at adequate volume and pressure to supply fire hose streams or foam equipment.
4. Emerald Transformer shall test and maintain the equipment specified above in accordance with the manufacturer's recommendations to ensure proper operation in time of emergency. In the event any of the emergency response equipment specified above was manufactured by Emerald Transformer, Emerald Transformer shall establish and follow a testing and maintenance plan for those manufactured items.
5. Whenever PCBs are being poured, mixed, or otherwise handled, Emerald Transformer shall ensure that all workers involved in the operation will have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another worker.
6. At all times, there shall be at least one (1) worker present at the Emerald Transformer Facility or on call with the responsibility for coordinating all emergency response measures. This worker shall have immediate access to the entire Facility and to a device, such as a telephone or a hand-held two-way radio, immediately available at the scene of operation capable of summoning external emergency assistance. This worker must have the authority to commit the resources needed to carry out contingency measures of this Approval, the Emerald Transformer Application, or the PCB Regulations, or that are otherwise appropriate.
7. Within thirty (30) calendar days from the initial issuance of this Approval, Emerald Transformer shall provide a written description of storage activities, stored materials, and emergency procedures, as described in the Emerald Transformer Application, to local police departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency services, and shall provide updates of the written description as necessary.

8. Emerald Transformer shall review and promptly modify, if necessary, the SPCC Plan whenever:

- (a) such plan fails in an emergency;
- (b) Emerald Transformer changes the Facility's design, construction, operation, maintenance, or emergency response policies;
- (c) a circumstance arises that materially increases the potential for fires, explosions, or releases of PCBs or hazardous constituents;
- (d) the list of emergency coordinators changes;
- (e) the list of emergency equipment changes;
- (f) a revision is warranted to prevent an unreasonable risk of injury to health and the environment; or
- (g) EPA determines that a revision to such plan is necessary.
- (h) Emerald Transformer shall submit proposed modifications, whether minor or major, to its SPCC Plan to EPA in the form of a modified application and shall not implement such modifications until it receives written EPA approval.

9. Emerald Transformer shall annually review and as necessary update the information regarding the PCB operations at the Facility, stored materials, contingency plans, and emergency procedures provided to local police departments, hospitals, and state and local emergency response teams that may be called upon to provide emergency service.

10. If at any time EPA determines that PCB operations at the Facility authorized by this Approval are creating a situation of imminent hazard, EPA will notify Emerald Transformer as to the steps required to mitigate and/or prevent the hazard. Such steps must be taken by the date provided in such notice.

H. Recordkeeping and Reporting

- 1. Emerald Transformer shall comply with all applicable recordkeeping and reporting requirements of the PCB Regulations, including but not limited to, annual records, annual document logs and annual reports as required by § 761.180.
- 2. Emerald Transformer shall maintain daily records of storage inventories which are sufficient to determine compliance with the Maximum Storage Capacity (MSC) and related requirements for PCBs and PCB Items specified in Condition C.1.
- 3. Emerald Transformer must maintain records demonstrating compliance with the requirements of 40 CFR § 761.180(a) and (b) and this Approval:

- (a) the documentation of PCB content, sampling and analytical testing requirements of Condition C.5(e);
- (b) the inspection requirements of Condition C.6(b), which shall be in the form of inspection records;
- (c) the cleanup and disposal requirements of Conditions C.6(a) and (c), F.2, and F.4;
- (d) the repair requirements of Condition C.6(d);
- (e) the worker training requirements of Conditions E.4 and E.5, which shall include the name and title of the individual, the date(s) of the training, and a signature sheet certifying that the signatory completed training in accordance with the Emerald Transformer training manual on the date specified;
- (f) the detection of exceedance(s) and decontamination requirements under Conditions E.6, E.7, E.8, and E.9;
- (g) the spill requirements of Conditions F.1 and F.2;
- (h) the reporting requirement of Condition F.3, which shall include the items, and certification, if applicable, required under 40 CFR § 761.125;
- (i) the disposal requirement of Condition F.4;
- (j) the equipment maintenance and testing requirements of Condition G.4; and
- (k) the emergency responder notification requirements of Condition G.7; and
- (l) Manifest requirements. Emerald Transformer shall comply with the following provisions of 40 CFR Part 761, Subpart K, as applicable:
 - i. 761.207 – Manifest – General requirements;
 - ii. 761.210 – Use of the manifest – Generator requirements;
 - iii. 761.213 – Use of the manifest – Commercial storage and disposal facility requirements.;
 - iv. 761.214 – Retention of manifest records;
 - v. 761.215 – Manifest discrepancies;
 - vi. 765.216 – Unmanifested waste report;
 - vii. 761.217 – Exception reports; and
 - viii. 761.219 – One-year exception reporting.

4. Emerald Transformer shall maintain copies of the manifests, either paper copies or electronically available in an online e-Manifest account, and certificates of disposal for all PCBs and PCB Items that have been stored at the Emerald Transformer Facility. Emerald Transformer shall provide copies of certificates of disposal to the generator of PCBs and PCB Items that were stored at Emerald Transformer facility within thirty (30) calendar days of

receipt by Emerald Transformer of documentation of final disposal of such PCBs and PCB Items.

5. All records relating to sampling, analysis, and quality assurance required by the PCB Regulation or this Approval shall include the following:

- (a) exact date, place, and time of each sample collected;
- (b) volume of each sample collected;
- (c) name of person collecting each sample;
- (d) name of analyst;
- (e) date and time of analysis;
- (f) the analytical techniques or methods used for each sample;
- (g) the analytical results including chromatographs, calculations, and other raw data;
- (h) calibration records and maintenance records of sampling equipment and analytical instrumentation; and,
- (i) records of quality assurance/quality control activities.

6. All records required to be maintained either by the PCB Regulations or this Approval shall be legible and prepared in black ink or typed. Any modification or correction of the records must be initialed and dated by an Emerald Transformer worker authorized to make such change. If the recordkeeping is maintained electronically, Emerald Transformer shall produce and maintain hard copy printouts when requested by EPA and shall back-up the data on a daily basis. During any period in which the electronic recordkeeping system is rendered non-operational, Emerald Transformer must implement a comparably reliable alternate recordkeeping system in its place.

7. All records required to be maintained either by the PCB Regulations or this Approval shall be maintained at one centralized location at the Emerald Transformer Facility, and shall be made available for inspection by EPA authorized representatives. When Emerald Transformer ceases operations, all such records shall be made available to EPA at the Emerald Transformer Facility for a period of at least five (5) years following cessation of operations. If Emerald Transformer is unable to comply with this condition because it is no longer in control of the site, it shall comply by making such records available at an alternative location proposed by Emerald Transformer and approved by EPA in writing.

8. All reports, notifications and other information requested to be provided to the EPA shall be signed by an Emerald Transformer officer or by the Emerald Transformer Environmental and Safety Manager.

9. By July 15 of each year, Emerald Transformer must submit to EPA a PCB Annual Report summarizing the records and annual document log required to be maintained and prepared under 40 CFR. § 761.180(b)(1) and (b)(2). The contents of the annual report are listed in 40 CFR. § 761.180(b)(3)(i)-(vii). Emerald Transformer must submit PCB Annual Reports using EPA Form 6200-025 to the Director of the Office of Resource Conservation and Recovery. Emerald Transformer must send PCB Annual Reports by email to ORCRPCBs@epa.gov and by postal mail to:

Document Control Officer (5303T)
ATTN: PCBs Annual Report
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W. Washington, DC 20460-0001

10. Emerald Transformer shall submit to the EPA Project Manager a copy of the Self-Monitoring Report required by the Facility's "WW Permit." The copy of the Self-Monitoring Report must have a detection limit for PCB concentrations that is <3 micrograms per liter (µg/L).

11. At the completion of any PCB cleanup required by this Approval, 40 CFR. Part 761 or by order of any agency, Emerald Transformer shall develop and maintain records of the cleanup including at a minimum:

- (a) Identification of the source of the contamination;
- (b) Date and time contamination was discovered;
- (c) Date and time cleanup was completed;
- (d) A brief description of contaminated area;
- (e) Pre-cleanup and post-cleanup sampling data used to define boundaries of contamination, and a brief description of the sampling methodology used to establish contaminated boundaries;
- (f) Amount of waste cleanup material generated;
- (g) Date of notification and report to EPA: and
- (h) A "certification," as defined in 40 CFR § 761.3 that information contained in the record is true, accurate, and complete.

12. Unless otherwise specified herein, reports, notification, mail or other submittals required to be submitted to the EPA under this Approval shall be sent to:

Permits Office (Attn: LND 4-2)
Land, Chemicals & Redevelopment Division
U.S. Environmental Protection Agency - Region 9
75 Hawthorne Street
San Francisco, CA 94105

13. No recordkeeping, report or communication required under this Approval shall qualify as a self-audit or voluntary disclosure under EPA audit, self-disclosure or penalty policies.

I. Closure and Financial Assurance

1. Emerald Transformer shall maintain financial assurance as specified in 40 CFR § 761.65(g) and 40 CFR Part 264, Subpart H, to provide for:

- (a) funding in accordance with the approved closure plan listed in Condition I.2.; and
- (b) compensating others for bodily injury and property damage caused by accidents arising from operations of the Facility.

2. The Closure Plan and Closure Cost Estimate submitted as part of the Emerald Transformer Application is deemed acceptable under 40 CFR § 761.65(e) and is incorporated by reference into this Approval. Emerald Transformer shall comply with the approved Closure Plan and Closure Cost Estimate.

3. Emerald Transformer has demonstrated financial assurance for closure of the Emerald Transformer Facility as required by 40 CFR § 761.65(g). Emerald Transformer may not modify its mechanism for financial assurance without prior written approval from EPA. Emerald Transformer shall submit proposed changes to its financial assurance mechanism to Director of LCRD and shall not implement such modification until it receives written EPA approval.

4. Emerald Transformer shall adjust the Closure Cost Estimate annually to reflect inflation as required by 40 CFR § 761.65(f)(2) within sixty (60) days prior to the anniversary date of the establishment of the financial assurance instrument used (or, if using the financial test or corporate guarantee, within 30 days after the close of Emerald Transformer's fiscal year). Emerald Transformer shall submit a copy of the annually adjusted Closure Cost Estimate to EPA no later than the annual anniversary of the effective date of this Approval. If the annual adjustment to the Closure Cost Estimate changes the required amount such that it exceeds the face value of the existing financial assurance mechanism, Emerald Transformer shall make a corresponding increase to its financial assurance mechanism. In the event modification to the financial assurance mechanism amount is required, Emerald Transformer shall submit documentation of adequate financial assurance to the Regional Administrator.

5. Emerald Transformer shall modify the Closure Plan and Closure Cost Estimate whenever any changes in ownership, operating plans, maximum storage capacity or facility design affect the Closure Plan; whenever there is a change in the expected year of closure; or whenever unexpected events during closure require modification. If Emerald Transformer becomes aware of information indicating that the estimated costs associated with performing closure of the Emerald Transformer Facility may exceed the current Closure Cost Estimate approved by EPA, Emerald Transformer shall modify the Closure Plan and/or Closure Cost Estimate, as appropriate. Emerald Transformer shall submit proposed modifications to its Closure Plan and/or Closure Cost Estimate to EPA in the form of a modified application and shall not implement such modifications until it receives written EPA approval. Emerald Transformer shall base modifications to Closure Cost Estimates on maximum cost conditions, as specified in 40 CFR § 761.65(f)(i) - (iv), and shall submit them to EPA with a "certification," as defined in 40 CFR § 761.3.

6. When an EPA-approved modification to the Facility's Closure Plan increases the Closure Cost Estimate, or when EPA approves a modification which increases the Facility's Closure Cost Estimate, Emerald Transformer shall make corresponding increases to its financial assurance and provide documentation to EPA of such change no later than thirty (30) days after such modification is approved by EPA.
7. When an EPA-approved modification to the Facility increases the maximum storage capacity in Condition C.1(a), Emerald Transformer shall notify the Director of LCRD in writing no later than thirty (30) days from the completion of the modification and either establish a new financial assurance or amend the existing financial assurance mechanism. The new or amended financial assurance mechanism must be established and activated no later than thirty (30) days after notification of the completion of the modification but prior to the use of the modified portion of the Facility.
8. Emerald Transformer shall keep a copy of the most recently approved Closure Plan, Closure Cost Estimate and financial assurance document(s) at the Facility and make such documents available to EPA authorized representatives, upon request.
9. Emerald Transformer shall notify the Regional Administrator or their Delegate in writing at least sixty (60) days prior to the date it expects to begin closure. The date Emerald Transformer "expects to begin closure" shall be no later than thirty (30) days after the date on which Emerald Transformer receives its final quantities of PCB waste for storage.
10. In accordance with Emerald Transformer's approved closure plan, Emerald Transformer shall remove all PCB waste in storage at Emerald Transformer Facility within ninety (90) days after receiving the final quantity of PCB waste for storage and shall complete closure activities within 180 days after receiving the final quantity of PCB waste for storage.
11. Upon termination of the operation, Emerald Transformer shall proceed according to the provisions of the Closure Plan submitted to and approved by EPA. As used in this paragraph, "termination of the operation" includes voluntary cessation of operations and cessation of operations required by expiration, termination, or revocation of this Approval.
12. During the closure period, all contaminated system component equipment, structures, and soils shall be disposed of in accordance with the disposal requirements of 40 CFR Part 761, Subpart D, or, if applicable, decontaminated in accordance with the levels specified in the PCB Spill Cleanup Policy, 40 CFR Part 761, Subpart G.
13. If PCB waste is removed from the storage facility during closure, Emerald Transformer will become a generator of PCB waste subject to the generator requirements of 40 CFR Part 761, Subpart J.
14. Within sixty (60) days of completion of closure of the Emerald Transformer Facility, Emerald Transformer shall submit to the EPA Regional Administrator or their Delegate a certification that the Facility has been closed in accordance with the approved closure plan. The certification shall be signed by Emerald Transformer and by an independent registered professional engineer.

15. Emerald Transformer shall submit to Director of LCRD a revised Closure Plan reflecting current conditions at the Facility at least 180 days prior to the anticipated beginning of closure activities. The revised Closure Plan must be approved in writing by EPA prior to implementation.

16. Emerald Transformer may petition Director of LCRD for permission to forgo submittal of a revised Closure Plan at least 180 days prior to the anticipated beginning of closure activities. In that petition, Emerald Transformer shall demonstrate that there have been no significant changes to the conditions at the Facility that would warrant revisions to the Closure Plan. The requirement to submit a revised Closure Plan at least 180 days prior to the anticipated beginning of closure activities will only be waived upon a written notification from EPA to Emerald Transformer granting the petition.

**DECISION TO APPROVE EMERALD TRANSFORMER'S APPLICATION TO
COMMERCIAL STORE PCB WASTE**

EPA has determined that the criteria for approval to engage in the commercial storage of PCB waste set forth in 40 CFR § 761.65(d) have been met. Specifically, the Application demonstrates that Emerald Transformer's storage facility, storage capacity, employee qualifications, closure plan, and financial assurance for closure satisfy applicable requirements and that operation of the storage facility, when conducted in accordance with the conditions of this Approval and all applicable provisions of the PCB regulations, will not pose an unreasonable risk of injury to health or the environment. EPA approves the Emerald Transformer Application to commercially store PCBs and PCB Items for disposal at the Emerald Transformer Facility.

This Approval shall become effective the date the Director of LCRD, acting on Emerald Transformer's Application, signs it and shall expire 10 years from such date, unless suspended, revoked or terminated, or administratively continued, in accordance with the conditions of this Approval, or unless otherwise authorized under applicable law.

This approval does not relieve Emerald Transformer from compliance with all applicable federal, state and local regulatory requirements, including the federal PCB regulations at 40 CFR. Part 761.

/s/ 12/08/2025

Claire Trombadore
Director
Land, Chemicals, and Redevelopment
Division U.S. Environmental Protection
Agency Region 9

Attachment A: Diagrams of Facility and Approved Storage Areas (Condition B.1(a))**Figure 1 - Site Location Map****Emerald Transformers Los Angeles, LLC**

5756 Alba Street Los Angeles, CA

EPA ID: CAD050806850

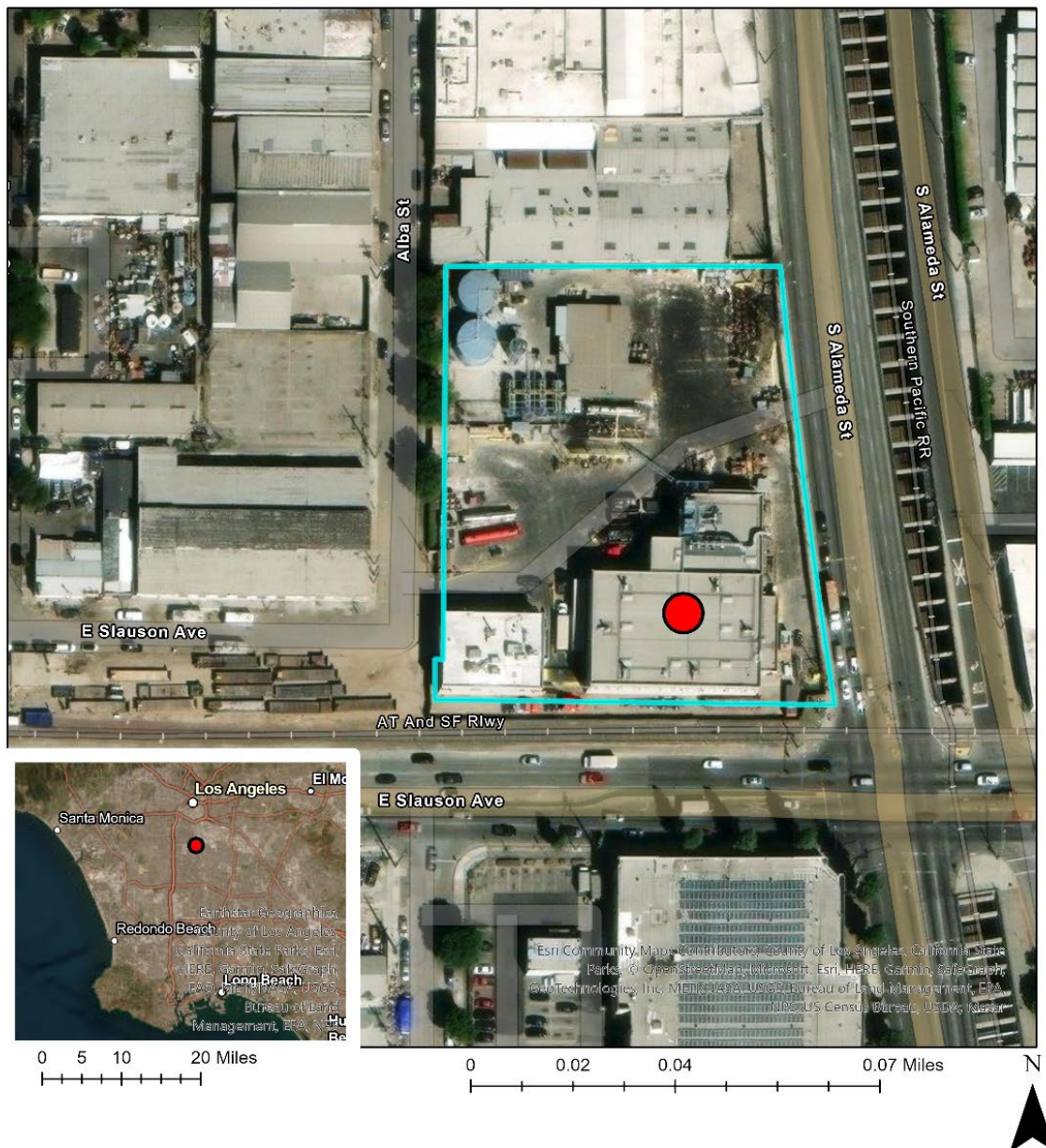
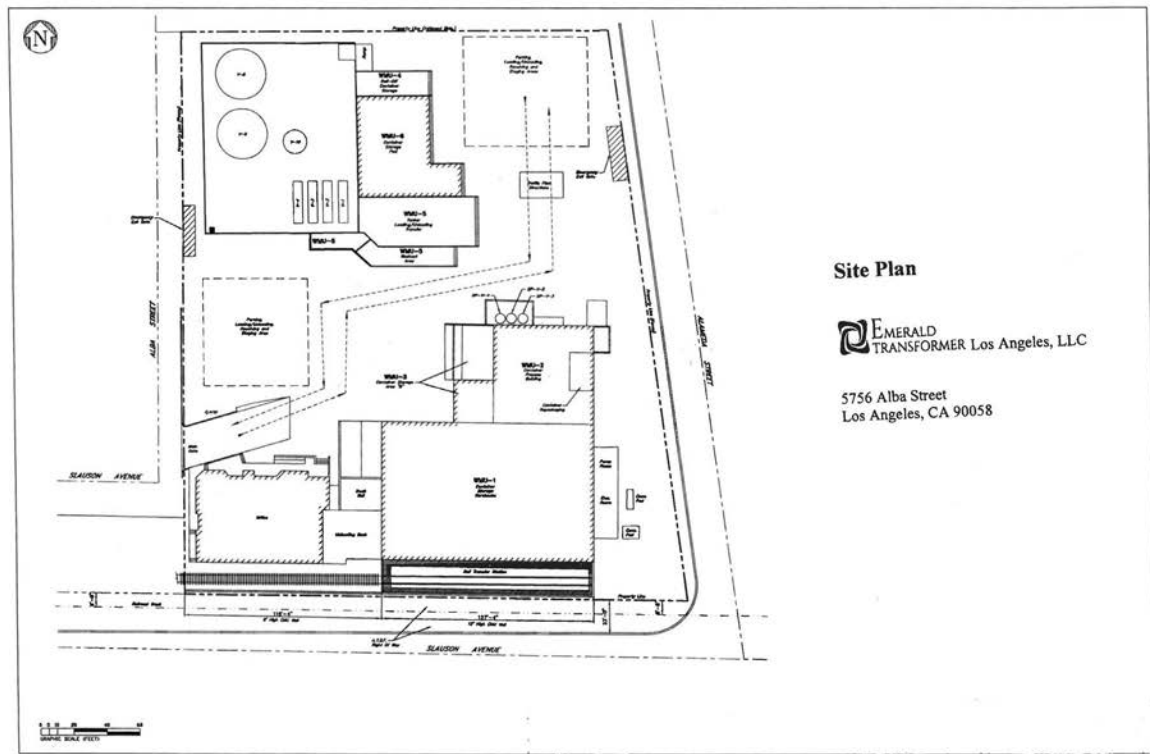
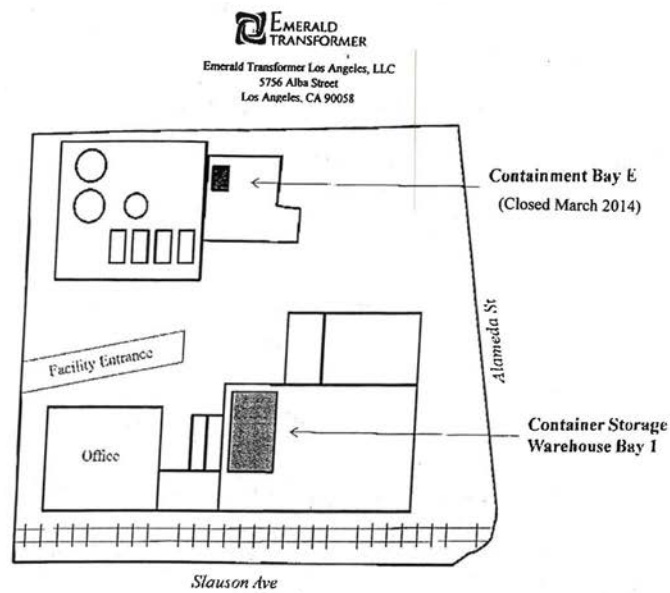


Figure 2 – Facility Diagram**Figure 3 – PCB Storage Warehouse**

Emerald Transformer Los Angeles, LLC
Facility Diagram

Figure 3-1 - Sample Pallet Configuration Bay 1 (TSCA Unit)