



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

Naomi Mattingly
EHS Manager
Hydrodec of North America, LLC
2021 Steinway Blvd. SE
Canton, OH 44707

Re: Minor Modification of the January 8, 2018, Federal TSCA Approval to Treat and Commercially Store PCBs, Hydrodec of North America, LLC; EPA ID#: OHR000143263

Dear Ms. Mattingly:

The U.S. Environmental Protection Agency received a request for a modification to the January 8, 2018, Federal Toxic Substances and Control Act (TSCA) Approval to Treat and Commercially Store polychlorinated biphenyls (PCBs) for Hydrodec of North America, LLC (Hydrodec) located at 2021 Steinway Blvd. SE in Canton, Ohio (Approval). A description of Hydrodec's change in operations to receive PCB transformers and to transfer PCB oil from transformers to approved PCB storage tanks was received on May 5, 2021. On May 11, 2021, Hydrodec submitted an email response to EPA comments. On May 25, 2021, Hydrodec submitted a written request for a modification to the PCB Approval to EPA.

Based upon a review of the relevant correspondence regarding Hydrodec's proposed change in operations, EPA finds that the transfer of PCB oil to approved PCB storage tanks does not require a modification to the Approval and that the storage of transformers and totes does require a modification to the Approval. In accordance with the Process/Equipment Modifications condition of the Approval, EPA finds that the requested changes do not affect overall performance or environmental impact and constitute a minor modification. Further details regarding these findings are described below.

Hydrodec's proposed change in operations include the processing activities of (1) transferring PCB oil from transformers directly to PCB storage tanks P-TK-734 and P-TK-735 and (2) transferring PCB oil from transformers to an intermediate tote and then to PCB storage tanks P-TK-734 and P-TK-735. In accordance with 40 Code of Federal Regulations 761.20(c)(2)(i), EPA finds that these processing activities are primarily associated with and facilitate storage for disposal and therefore, do not require a TSCA PCB storage or disposal approval. The intermediate tote to be used for these processing activities may be considered moveable

equipment provided that PCB oil in the intermediate tote is transferred immediately to PCB storage tanks P-TK-734 and P-TK-735. As you represented to EPA in your correspondence, PCB oil will not be left in the intermediate tote for longer than 24 hours. The tote must be closed with a sealed lid when not transferring liquids to or from the tote. The volume of oil in the intermediate tote counts towards the PCB approved storage capacity in the Approval. Condition 16.i. of the Approval, Moveable Equipment, must be followed for managing the intermediate tote.

Because the Approval specifically lists 55-gallon drums as the only container type allowed in the PCB storage area in Building A, a minor modification is required for storage of transformers and totes. The modification to the January 8, 2018, Approval to Treat and Commercially Store PCBs is listed below.

Condition 16.a. shall now be as follows:

a) Approved PCB Storage Areas

Hydrodec is authorized to store PCB contaminated oil in dedicated PCB oil storage tanks and PCB contaminated oil and wastes in drums, totes, and PCB articles at or below the capacity limits specified below. The capacity represents the total commercial waste storage limits for PCBs.

PCB Storage Areas	PCBs Stored	PCB Containers	Capacity (gallons)
Dike C (PCB Building)	PCB Oil	2 8,200-gallon tanks (P-TK-734 and P-TK-735)	16,400
Building A	PCB Contaminated Oil and Waste	55-gallon drums, totes, and PCB articles (transformers)	880

Total liquid storage = 17,280 gallons
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Hydrodec is authorized to store PCB-containing oil in the following process tanks and containers.

- One (1) 500-gallon blend tank (TK-785)

- One (1) 350-gallon feed tank (TK-005)
- One (1) 50-gallon oil/water separator (VE-784)

Process tank TK-005 shall be part of the PCB treatment system flush described in Condition 2(a)(3).

Process tank TK-785 and oil/water separator VE-784 shall be dedicated to the treatment of PCB-containing oil.

This letter serves as a minor modification to the Approval. All other conditions of the January 8, 2018, Approval to Treat and Commercially Store PCBs remain in effect. This letter along with the 2018 Approval constitutes your complete federal TSCA PCB Approval.

Modification of the January 8, 2018 Approval does not relieve Hydrodec 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,

Tammy Moore
Chief
Land and Chemicals Branch

cc: John Steketee, EPA ORC
Lisa Graczyk, EPA
Bradley Mitchell, OEPA
Casey Sutton, Hydrodec, Head of Automation and Production