I. PURPOSE

This procedure is implemented for all PCB materials being received in order to actively comply with all facility permits and regulatory citations. Implementation of this procedure requires the imposition of mandatory procedures for generators and customers sending PCB material to this facility. This procedure is consistent with good corporate policy and operating discipline.

This procedure addresses pre-acceptance generator required actions, transportation required actions, acceptance related actions, storage related actions, outbound actions, disposal and record-keeping actions, and training requirements. Customer Service staff, material routers, operations personnel, and transporters utilized by the facility for shipping PCB packages will follow this procedure.

California regulated PCB's are not addressed with this Standard Operating Procedure. California regulated PCB's are 5-49 ppm in PCB concentration unless the material was originally derived from a TSCA regulated source, in which case it is TSCA regulated.

II. RESPONSIBILITIES

A. Facility Manager

The Facility Manager will ensure the requirements of this procedure are met continually. The Facility Manager shall be responsible for ensuring that all required training, inspections, and operational procedures are performed as required, and in accordance with this procedure. The Facility Manager is also responsible for monitoring compliance.

B. Manager and Supervisor

The Manager and Supervisor are responsible for training employees on this procedure to ensure good operating practices in compliance with all appropriate regulations. Managers and supervisors are responsible for documenting such training and providing appropriate competency testing and updates as necessary.

C. Health and Safety Manager

The Health and Safety Manager is responsible for Job Hazard Analysis (see Appendix A), assisting the determination of the proper Personal Protective Equipment that must be employed when handling PCB materials (see Appendix B). The Health and Safety Manager is also responsible for assisting in the development of procedures necessary to safely handle materials listed by this

procedure utilizing a Workplace Hazard and Personal Protective equipment Assessment (see Appendix C) and developing and implementing training.

D. Environmental Manager

Then Environmental Manager is responsible for assisting development of good operating procedures that comply with all relevant permits and regulatory citations.

E. Employee

The employee is responsible for promptly reporting any deviation from this procedure or non-compliance situation which may develop. The employee is responsible for following all facility policies and procedures and using good judgment during implementation of this and other procedures.

III. PROCEDURES

A. Pre-Acceptance

1. The waste profile evaluation process is used to prescreen waste prior to its acceptance at the Facility. To initiate the PE process, the waste generator is required to submit the following:

a) A completed Waste Material Profile Sheet. This sheet provides information on the chemical and physical characteristics of the waste material. An example of this sheet is shown in Appendix D.
b) A representative sample of the waste material with a chain-of-custody, if required. If sampling is required, waste generators are referred to 22 CCR 66261.20 for the appropriate sampling procedure. When necessary, this sample may be obtained upon arrival of the initial shipment of waste prior to acceptance at the Facility.
c) A representative sample may not be required if the Facility determines the pre-acceptance documentation provides sufficient information to maintain compliance with permit and operational conditions and obtaining a sample would not aid in the waste management decision process.

2. Central Profile Group (CPG) receives PCB profile from the customer.

3. PCB specific information Refer to the PCB Guidance Document (see Appendix D) for necessary information. Note: The Date-Removed-From-Service is the same as the Out-of-Service-Date (OSD).

4. The Profile is entered into the company's waste tracking system if it has not been submitted electronically.

5. CPG reviews the profile for completeness and accuracy. For TSCA materials, PCB concentrations determinations are evaluated in accordance with the requirements of 40 CFR761.2

6. Incomplete profiles or other documentation will be corrected by the CPG and returned to the customer. Reference the PCB Guidance Document which is attached at the end of this procedure for required information.

7. After the information is in place, the profile is approved.

B. Scheduling

1. The PCB load is scheduled once the profile is correct.

C. Receiving

1. Paperwork is reviewed upon load arrival and the information is reviewed for compliance with the requirements of 40CFR 761.208 – 211 and managed accordingly as follows:

a) Sign and date each copy of the manifest to certify that the PCB waste covered by the manifest was received.
b) Note any significant discrepancies in the manifest (as defined in §761.210(a)(1)) on each copy of the manifest.
c) Immediately give the transporter at least one copy of the signed manifest.
d) Within 30 days after the delivery, send a copy of the manifest to the generator.
e) Retain a copy of each manifest among the facility's records in accordance with §761.209(d).

2. In the event that a manifest discrepancy is discovered as defined in 40CFR 761.210(a) the facility shall attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the PCB waste, the facility shall immediately submit

to the Regional Administrator for the Region in which the designated facility is located a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest or shipping paper at issue.

3. If the facility receives any shipment of PCB waste from an off-site source without an accompanying manifest or shipping paper (where required in place of a manifest), and any part of the shipment consists of any PCB waste regulated for disposal, the facility shall attempt to contact the generator, using information supplied by the transporter, to obtain a manifest or to return the PCB waste.

4. If the facility cannot contact the generator of the PCB waste, it will notify the Regional Administrator of the EPA region in which his facility is located of the unmanifested PCB waste so that the Regional Administrator can determine whether further actions are required before the owner or operator may store or dispose of the unmanifested PCB waste.

5. Within 15 days after receiving the unmanifested PCB waste, the facility shall prepare and submit a report to the Regional Administrator for the Region in which the commercial storage or disposal facility is located and to the Regional Administrator for the Region in which the PCB waste originated, if known. The report may be submitted on EPA Form 8700–13B, or by a written letter designated "Unmanifested Waste Report." The report shall include the following information:

a) The EPA identification number, name, and address of the PCB commercial storage or disposal facility.
b) The date the commercial storage or disposal facility received the unmanifested PCB waste.
c) The EPA identification number, name, and address of the generator and transporter, if available.
d) A description of the type and quantity of the unmanifested PCB waste received at the facility.
e) A brief explanation of why the waste was unmanifested, if known.
f) The disposition made of the unmanifested waste by the commercial storage or disposal facility, including:

6. The owner facility will retain at the facility for at least 3 years a copy of each manifest or shipping paper that the owner or operator signs for off-site shipments of PCB waste.

7. The PCB materials are unloaded and normal unloading procedures apply except for the following regarding PCB containers (Appendix E provides additional evaluation standards):

a) Copies of manifest and continuation sheets shall be included with the normal receiving packet for piece count confirmation and QC by the receiving staff.

b) PCB Containers shall be visually inspected for non-conforming conditions, such as exterior contamination or visible residues, missing Generator Unique Identification Number, hazardous Waste Markings and PCB Markings not completed properly, missing Emergency Contact information, not recorded on the container, or any information not clearly visible.

c) Non-conforming information shall be listed on the QC Receiving Sheet and resolved as soon as possible.

d) Samples will not be taken from PCB containers without authorization from the Facility Manager, Operations Manager, Environmental Manager and/or the Health and Safety Manager.

D. Storage

1. Any pallets received loaded with PCB containers shall be considered contaminated and go with the PCB containers to the PCB storage area.

2. Access to the PCB storage area is limited to authorized employees. A warning sign shall be located near the entrance to the PCB area stating "Restricted Area – Increased PPE Level Required".

3. A chain and standards, constructed of material that can readily be decontaminated, disposed, and/or replaced, shall provide a physical entry barrier to the PCB storage area.

4. PCB Warning Placards (i.e. M_L label) as required by 40 CFR 761.65(c)(3) shall be prominently displayed near the PCB storage area.

5. Emergency Contacts and evacuation routes shall be prominently displayed throughout the facility.

6. Personal protective equipment requirements for the warehouse shall be modified for the PCB storage area to include booties.

7. A satellite hazardous waste disposal container shall be located near the entrance to the PCB storage area for disposal of booties or other potentially PCB contaminated materials.

8. Pallets used to store PCB's shall be considered contaminated and disposed in accordance with all applicable regulations.

9. All equipment used when handling PCB's shall be dedicated to the PCB storage area and not removed from this area until properly decontaminated in accordance with 40 CFR 761.65(c)4. All equipment shall be marked with the appropriate M_L or M_S label. Forklifts shall not enter the PCB storage area. A dedicated forklift or pallet jack is the only equipment used in the storage area and articles may be pallet-jacked to the edge of the area where a forklift may then lift the article to/from storage and loading/unloading.

10. Inspection of the PCB Storage Area shall be conducted in accordance with the Inspection Plan.

11. PCB spills of any quantity shall be immediately reported to the Emergency Coordinator and the SPCC Plan shall be implemented.

a) Any size or quantity PCB spill must be cleaned-up immediately and documented according to the TSCA Permit and 40 CFR 761 standards.

b) All spilled or leaked materials shall be immediately cleaned up in accordance with 40 CFR 761.125 and the materials and residues containing PCBs shall be disposed of in accordance with 40 CFR 761.61. Any spilled PCBs with sufficient quantity to make its way to sumps or trenches will be either cleaned using sorbent material or pumped (if quantities are sufficient) to a container. The sumps and/or trenches will be cleaned as outlined above and the material will be managed in accordance with applicable regulatory requirements as outlined in this SOP.

c) Records of inspections, maintenance, cleanup and disposal must be maintained in accordance with 40 CFR 761.180(a) and (b).

E. Transportation

1. The facility will comply with the manifest requirements as both receiving and shipping (generator) facility in accordance with the manifest requirement set forth in 40 CFR 761. Receiving requirements are detailed in Section C of this document. The facility will comply with the manifest requirement for all outbound shipments.

2. The facility will prepare a manifest on EPA Form 8700–22 (see Appendix F), and if necessary, a continuation sheet and specify:

a) For each bulk load of PCBs, the identity of the PCB waste, the earliest date of removal from service for disposal, and the weight in kilograms of the PCB waste.
b) For each PCB Article Container or PCB Container, the unique identifying number, type of PCB waste (*e.g.,* soil, debris, small capacitors), earliest date of removal from service for disposal, and weight in kilograms of the PCB waste contained.
c) For each PCB Article not in a PCB Container or PCB Article Container, the serial number if available, or other identification if there is no serial number, the date of removal from service for disposal, and weight in kilograms of the PCB waste in each PCB Article.

3. The facility will:
a) Sign the manifest certification by hand.
b) Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest.
c) Retain one copy among its records in accordance with §761.209(a).
d) Give to the transporter the remaining copies of the manifest that will accompany the shipment of PCB waste.

4. For outbound PCB waste, the facility will keep a copy of each manifest signed in accordance with §761.208(a)(1) until the generator receives a signed copy from the designated commercial storage or disposal facility which received the PCB waste. The copy signed by the commercial storer or disposer shall be retained for at least 3 years from the date the PCB waste was accepted by the initial transporter.

5. For outbound PCB waste, subject to the manifesting requirements, the facility will submit an Exception Report to the EPA Regional Administrator if copy of the manifest with the hand written signature of the owner or operator of the designated facility is not received within 45 days

of the date the waste was accepted by the initial transporter. The exception report shall be submitted to EPA no later than 45 days from the date on which the generator should have received the manifest. The Exception Report shall include the following:

a) A legible copy of the manifest for which the generator does not have confirmation of delivery.
b) A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the PCB waste and the results of those efforts.

6. The facility shall submit a One-year Exception Report to the EPA Regional Administrator for the Region in which the generator or commercial storer is located no later than 45 days from the date the following occurs:

a) The generator or commercial storer transferred the PCBs or PCB Items to the disposer of PCB waste on a date within 9 months from the date of removal from service for disposal of the affected PCBs or PCB Items, as indicated on the manifest or continuation sheet; and
b) The generator or commercial storer either has not received within 13 months from the date of removal from service for disposal a Certificate of Disposal confirming the disposal of the affected PCBs or PCB Items, or the generator or commercial storer receives a Certificate of Disposal confirming disposal of the affected PCBs or PCB Items on a date more than 1 year after the date of removal from service.

7. The One-year Exception Report shall include:

a) A legible copy of any manifest or other written communication relevant to the transfer and disposal of the affected PCBs or PCB Items.
b) A cover letter signed by the submitter or an authorized representative explaining:
    (1) The date(s) when the PCBs or PCB Items were removed from service for disposal.
    (2) The date(s) when the PCBs or PCB Items were received by the submitter of the report, if applicable.
    (3) The date(s) when the affected PCBs or PCB Items were transferred to a designated disposal facility.
    (4) The identity of the transporters, commercial storers, or disposers known to be involved with the transaction.

(5) The reason, if known, for the delay in bringing about the disposal of the affected PCBs or PCB Items within 1 year from the date of removal from service for disposal.

8. Liquid PCB's must be shipped in secondary containment or enclosed vans.

9. Necessary Emergency Response equipment may include, but is not limited to, a salvage drum and absorbent for all PCB shipments.

10. A chain and standards, constructed of material that can readily be decontaminated, disposed, and/or replaced, shall provide a physical entry barrier to the PCB storage area.

F. Disposal/Decontamination

1. PCB liquids at concentrations ≥50 ppm will be disposed at and incinerator in compliance with 40 CFR 761.70 or at an alternative facility (for concentrations between ≥50 ppm and <500 ppm) as set forth in 40 CFR 761.60(a) or at a TSCA permitted facility for dechlorination in accordance with 40 CFR 761.79

2. PCB articles shall be managed in accordance with 40 CFR 761.60(b). Concentration limits will be taken into consideration when determining the final disposal outlet (e.g. PCB Capacitors with concentrations ≥500ppm will be sent for incineration).

3. PCB Containers shall be managed in accordance with 40 CFR 761.60(c). Concentration limits will be taken into consideration when determining the final disposal outlet

IV. RECORDS

The facility maintains a records management system designed to accurately track all PCB waste materials received, stored, and shipped off site during each calendar year. This system assembles and maintains the annual records and the written annual document log as required in 40 CFR 761.180(b)(1) and (2).

Annual Records, including: Manifests, Certificates of Disposal, and Records of Inspections and cleanups will be maintained on-site for a minimum of 3 years after the facility ceases using or storing PCB items. This information is maintained at the facility and is available for review by EPA Representatives.

The Annual Document log will be prepared by July 1 covering the previous calendar year and will be maintained on-site for a minimum of 3 years after the facility ceases using or storing PCB items. This information is maintained at the facility and is available for review by EPA Representatives.

In addition to the information contained in the logs, the facility maintains a copy of all laboratory analyses, waste acceptance information Closure Cost Estimate, and Financial Assurance Documentation.

The information collected above is used to prepare reports and logs required under the 40 CFR 761.180(c) or in the facility operating permits.

V. REPORTING

As required by 40 CFR 180(b)(3), the facility will generate and submit a PCB Annual Report on or before July 15th of each year. The PCB Annual Report will be for the entire facility and will include the following items:

A list of all signed manifests of PCB waste initiated and/or received by the facility during that year.

The total weight in kilograms of:
Bulk PCB waste
PCB waste in PCB transformers
PCB Large High or Low Voltage Capacitors
PCB waste in PCB Article Containers
PCB waste in PCB Containers

in storage at the facility at the beginning of the calendar year, received or generated at the facility during the calendar year, transferred to another facility during the calendar year, disposed of at the facility during the calendar year, and remaining in storage for disposal at the facility at the end of the calendar year.

The total number of:
PCB transformers
PCB Large High or Low Voltage Capacitors
PCB Article Containers
PCB Containers

in storage at the facility at the beginning of the calendar year, received or generated at the facility during the calendar year, transferred to another facility during the calendar year, disposed of at the facility during the calendar year, and remaining in storage for disposal at the facility at the end of the calendar year.

VI. TRAINING

Personnel referenced in the SOP shall receive training based upon their assigned duties. Training records shall be maintained on-site.

VII. IMPACTS/CONSEQUENCES OF DEPARTURE FROM REQUIREMENTS

Improper implementation of this procedure could result in exceedance of facility permitted capacity and exposure to potential violations. The consequence of not following this procedure could result in environmental damage and costly violations and loss of company reputation.

VIII. REFERENCES

A. Clean Harbors Los Angeles, LLC - PCB Commercial Storer Permit

B. 40 CFR 761

IX. APPENDICES

A. Job Hazard Analysis Worksheet

B. Personal Protective Equipment – Hazard Assessment Record

C. Workplace Hazard and Personal Protective Equipment Assessment

D. PCB Guidance Document

E. PCB Manifest and Continuation Sheet

APPENDIX A: JOB HAZARD ANALYSIS WORKSHEET

JOB HAZARD ANALYSIS WORKSHEET				
FACILITY:	Clean Harbors Los Angeles, LLC 5756 Alba Street, Los Angeles, California 90058		Polychlorinated Biphenyls SOP	

I. JOB/TASK DESCRIPTION: Polychlorinated Biphenyls SOP

TASK	PERSONNEL	EQUIPMENT	DURATION
• Properly manage the receipt, paperwork, storage, equipment, and shipping of PCB material.	• Operations Manager • Operations Supervisor • Facility Technician • Manifest Clerk	• Pallet Jack • Forklift and Attachments • Various Containers • Pallets • Small Tools	• 15 minutes to several hours.

JOB REQUIREMENT/OBJECTIVE: Safely manage the receipt, paperwork, storage, equipment, movement, and shipping of PCB material.

II. HAZARD IDENTIFICATION: Polychlorinated Biphenyls SOP

A. OCCUPATIONAL HEALTH CONCERNS

CHEMICAL AGENTS	PHYSICAL AGENTS	BIOLOGICAL AGENTS
• Polychlorinated Biphenyls, Polyhalogenated Biphenyls and various other PCB contaminated materials. • PCB cleaning solvents. • Other waste chemical hazards not associated with PCBs such as RCRA waste hazards.	• PCB spills • Dedicated PCB handling equipment • Heavy drums, transformers, etc. • Pallets • Sharps	• PCB agents ingested or absorbed by contact. • PCB carrier solvents easily absorbed through the skin.

HEALTH HAZARD EVALUATION: Health hazard risks are low for office personnel and moderate for facility technicians and equipment operators. Facility technicians must be trained in PCB handling and wear the proper personal protective equipment while handling any PCB related materials.

Dedicated equipment shall remain in the PCB storage area for use only for the movement of PCB materials.

All PCB related spills must be reported immediately to a supervisor and proper PPE must be worn during any remediation or response efforts.

B. SAFETY CONCERNS

ACTIONS	CONDITIONS	VEHICLE	PROPERTY
• Not processing the paperwork properly. • Improper sampling material that is labeled as PCB. • Misidentifying or misclassifying PCB related materials. • Using non-dedicated equipment to move PCB materials. • Not wearing the proper PPE for handling PCB materials.	• Heavy drums, transformers, material. • PCB material spills. • Heavily contaminated drums, pallets or equipment. • Poor personal hygiene. • Poor decontamination procedures. • Poor equipment maintenance. • Cross-contamination.	• Poor equipment maintenance. • Poor vehicle, truck or trailer maintenance.	• Poor PCB storage area maintenance. • Poor facility maintenance.

SAFETY EVALUATION: Safety risks are low for office personnel and moderate for facility technicians. Facility personnel must not handle or contact directly PCB materials unless they have been specially trained and a Job Safety Briefing conducted.

Personnel must not sample PCB material unless prior approval is obtained from a supervisor.

Personnel must not use PCB-dedicated equipment for moving other materials as cross-contamination could result. Proper material handling techniques must be used for moving heavy drums or transformers. Contaminated containers or equipment must be decontaminated with the proper cleaning agents while wearing proper PPE. If decontamination is not adequate or not practical, contaminated containers must be overpacked.

C. ENVIRONMENTAL CONCERNS

RELEASE TO AIR	RELEASE TO SOIL	RELEASE TO WATER	OTHER
• Environmental risks only exist if hazardous materials get released.	• Environmental risks only exist if hazardous materials get released.	• Environmental risks only exist if hazardous materials get released.	• Not applicable.

ENVIRONMENTAL EVALUATION: Impact to the environment will not occur if personnel follow procedures and eliminate possible dangers. No migration off-site may occur. Storage areas have secondary containment.

III. JOB HAZARD CONTROL: Polychlorinated Biphenyls SOP

ENGINEERING	PPE	TRAINING	DECONTAMINATION	OTHER
• Job Hazard Analysis is required. • Job Safety Briefing may be required. • Dedicated pallet jack is provided for movement of drums in the PCB storage area.	• Hard hat, safety glasses, steel toed shoes, work uniform at all times. • Polyethylene coated Tyvek, PVC gloves with Nitrile Inner Gloves, Tyvek booties. • All extremities shall be covered and taped.	• Job Hazard Analysis training required. • Job Safety Briefing required.	• Contaminated PPE must be disposed of in the provided accumulation drum in the PCB storage area. • Contaminated drums and equipment must be decontaminated with approved cleaning agents.	• None.

PERSONNEL RESPONSIBLE FOR CONTROLS: Engineering controls and training requirements are the responsibility of the Facility Manager, Operations Manager and Operations Supervisor.

IV. JOB HAZARD ANALYSIS SUMMARY & ACTION REQUIRED:	Polychlorinated Biphenyls SOP

There are low to moderate risks associated with handling PCB materials.

The risks of handling can be minimized with proper training, PPE, decontamination, and other procedures. The highest risk is associated with leaking or spilled materials. As long as exposed materials are readily identified and immediately remediated, risks will be minimized and prevent employee exposure risk. Personal protective equipment utilization as defined by this procedure will eliminate any exposures.

In short, there are low risks associated with handling PCB materials that expose workers to injury or illness. As long as all procedures are followed without deviation, there should be no such exposures. All workers have a responsibility to follow procedures and minimize any risks.

APPENDIX B: PERSONAL PROTECTIVE EQUIPMENT HAZARD ASSESSMENT RECORD

PERSONAL PROTECTIVE EQUIPMENT HAZARD ASSESSMENT RECORD

Task at Facility: Polychlorinated Biphenyls SOP		**Hazard Categories (Check All Appropriate Items)**															
		Mechanical / Physical Hazards (List)									**Chemical Hazards**			**Biological Hazards**			
		Manual Container Movements	Sharps from pallets or containers potential	Pinch points from container handling	Splash potential						Contact with PCB residues/materials	Other secondary chemical hazards		Contact with PCB residues/materials			
Parts of Body																	
Head	Cranium																
	Ears																
	Eyes				X						X	X		X			
	Respiratory Tract										X	X		X			
	Face																
	Whole Head																
Upper Limbs	Hands	X	X	X							X	X		X			
	Arms		X														
Lower Limbs	Feet	X															
	Legs																
Various	Skin										X	X		X			
	Abdomen																
	Whole Body	X	X		X						X	X		X			

APPENDIX C: WORKPLACE HAZARD AND PERSONAL PROTECTIVE EQUIPMENT ASSESSMENT

1. **Location/Task:**
   Polychlorinated Biphenyls SOP – Handling of PCB materials.

2. **Hazards:**
   Potential carcinogenic hazards associated with PCB materials.

3. **PPE Required:**
   Respiratory protection and gloves only required when contamination or residues are present.

X	Gloves	X	Work Uniform
PVC w/ Inner Nitrile gloves	Specify Type	X	Tyvek
X	Hard Hat +	Polyethylene	Specify Type
X	Safety Glasses		Respirator
	Goggles		Cartridges/Type
	Face Shield	X	Steel Toed Boots
X – When containers are open.	SCBA/Airline	X	Metatarsal Guards

FACILITY GENERAL MANAGER: _____

HEALTH & SAFETY MANAGER: _____

APPENDIX D: WASTE PROFILE EXAMPLE

FOR INTERNAL USE ONLY:
☐ Normal Profile ☐ X-Profile
☐ One Time Waste ☐ Repeat Waste
Fax X-Profiles only to 617-380-3581

CleanHarbors
ENVIRONMENTAL SERVICES, INC.

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WASTE MATERIAL PROFILE SHEET

Profile Number CH 195752

A. GENERAL INFORMATION

GENERATOR EPA ID # _____
GENERATOR CODE (Assigned by Clean Harbors) _____ GENERATOR NAME: _____
ADDRESS _____ CITY _____ STATE_____ ZIP_____
GENERATOR TECHNICAL CONTACT: _____ PHONE:_____
CUSTOMER CODE (Assigned by Clean Harbors) _____ CUSTOMER NAME: _____
ADDRESS _____ CITY _____ STATE_____ ZIP_____

B. WASTE DESCRIPTION

Common Name of Waste: _____

Process Generating Waste: _____

Process Generating Waste:
(check one) If spill, origin of spilled material

- ☐ Unused chemical or product
- ☐ Lab Pack
- ☐ Spent halogenated solvents
- ☐ Spent non-halogenated solvents
- ☐ Wastewater treatment sludge from electroplating or etching operations
- ☐ Spent plating bath solutions or residues of plating, stripping and cleaning baths where cyanides are used in the process
- ☐ Wood preservation
- ☐ Inorganic pigment production
- ☐ Organic chemical production
- ☐ Inorganic chemical production
- ☐ Pesticide production
- ☐ Explosives production
- ☐ Petroleum refining
- ☐ Iron or steel production or finishing
- ☐ Primary copper production
- ☐ Primary lead production
- ☐ Primary zinc production
- ☐ Primary Aluminum production
- ☐ Ferro alloy production
- ☐ Secondary lead smelting
- ☐ Veterinary pharmaceutical production
- ☐ Ink formulation
- ☐ Coking
- ☐ Other_____
- ☐ Unknown

Source of Waste:
(check one)

- ☐ Unused Product or Chemical
- ☐ Waste by-product from process
- ☐ Spill clean up
- ☐ Lab Pack
- ☐ Planned site remediation
- ☐ Other:_____

Other Process Information:
(check all that apply)

- ☐ Still bottoms
- ☐ Process scrap
- ☐ Process development
- ☐ Out of date product
- ☐ Spent solvent waste
- ☐ Treatment residues
- ☐ Filter cake
- ☐ Degreasing
- ☐ Exempt recyclable material
- ☐ Packaged consumer goods
- ☐ Off-spec chemical product
- ☐ Zinc, Al, or tin plating
- ☐ Anodizing
- ☐ Cleaning/stripping
- ☐ Wastewater treatment sludges
- ☐ Washwaters
- ☐ Pot liners

Other Process Information:
(check all that apply)

- ☐ Electroplating
- ☐ Conversion coating
- ☐ Carbon steel plating
- ☐ Printed circuit mfg.
- ☐ Cyanide process
- ☐ Heat treating
- ☐ Separator sludge
- ☐ Oven residue
- ☐ Catalyst waste
- ☐ Centrifuged solids
- ☐ Condensate
- ☐ Air, steam, or vacuum stripping
- ☐ Emission control dust
- ☐ Acid leaching
- ☐ Dipping operations
- ☐ Chemical manufacturing
- ☐ Carbon adsorption
- ☐ Incineration or thermal treatment
- ☐ Refining
- ☐ Drug mfg.
- ☐ Distillation
- ☐ Pesticide mfg.
- ☐ Reclamation
- ☐ Etching of metals
- ☐ Bag house dust

Profile Number CH 195752

C. PHYSICAL PROPERTIES (at 25°C or 77°F)

PHYSICAL STATE
- ☐ SOLID WITHOUT FREE LIQUID
- ☐ POWDER
- ☐ MONOLITHIC SOLID
- ☐ LIQUID WITH NO SOLIDS
- ☐ LIQUID/SOLID MIXTURE
  - % FREE LIQUID _____
  - % SETTLED SOLID_____
  - % TOTAL SUSPENDED SOLID _____
- ☐ GAS/AEROSOL

NUMBER OF PHASES/LAYERS
☐ 1 ☐ 2 ☐ 3
% BY VOLUME (APPROX.)
TOP_____ MIDDLE_____ BOTTOM_____

VISCOSITY (If liquid present)
- ☐ LOW (e.g. WATER)
- ☐ MEDIUM (e.g. MOTOR OIL)
- ☐ HIGH (e.g. MOLASSES)

COLOR

ODOR
- ☐ NONE OR MILD
- ☐ STRONG

BOILING POINT (if liquid)
- ☐ ≤ 100°F
- ☐ > 100°F

MELTING POINT (for solids only)
- ☐ < 140°F
- ☐ 140-200°F
- ☐ > 200°F

FLASH POINT
- ☐ < 73°F
- ☐ 73-100°F
- ☐ 101-140°F
- ☐ 141-200°F
- ☐ > 200°F

pH
- ☐ ≤ 2
- ☐ 2.1 - 6.9
- ☐ 7 (neutral)
- ☐ 7.1 - 12.4
- ☐ ≥ 12.5

SPECIFIC GRAVITY
- ☐ < 0.8 (e.g. Gasoline)
- ☐ 0.8-1.0 (e.g. Ethanol)
- ☐ 1.0 (e.g. Water)
- ☐ 1.0-1.2 (e.g. Antifreeze)
- ☐ > 1.2 (e.g. Methylene Chloride)

TOTAL ORGANIC CARBON (If liquid)
- ☐ ≤ 1%
- ☐ 1-9%
- ☐ ≥ 10%

BTU/LB
- ☐ < 2,000
- ☐ 2,000-5,000
- ☐ 5,000-10,000
- ☐ > 10,000

VAPOR PRESSURE (for liquids only)_____ mm Hg

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Profile Number CH 195752

D. COMPOSITION (Must add up to at least 100%. Include inert materials and/or debris if applicable. Actual percent or range is acceptable.)

_____	_____	—	_____%	_____	_____	—	_____%
_____	_____	—	_____%	_____	_____	—	_____%
_____	_____	—	_____%	_____	_____	—	_____%
_____	_____	—	_____%	_____	_____	—	_____%
_____	_____	—	_____%	_____	_____	—	_____%

☐ Check if MSDS attached.

E. CONSTITUENTS — Attach any available analysis. Enter values or ranges where known. For TCLP values, BRL signifies below regulatory level. None, unknown, and present are also acceptable answers.

Are these values based on ☐ Knowledge or ☐ Testing?

INORGANIC

RCRA	REGULATED METALS	REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l
D004	ARSENIC	5.0	_____	_____
D005	BARIUM	100.0	_____	_____
D006	CADMIUM	1.0	_____	_____
D007	CHROMIUM	5.0	_____	_____
D007	CHROMIUM CR+6		_____	_____
D008	LEAD	5.0	_____	_____
D009	MERCURY	0.2	_____	_____
D010	SELENIUM	1.0	_____	_____
D011	SILVER	5.0	_____	_____

OTHER METALS	TOTAL
ALUMINUM	_____
ANTIMONY	_____
BERYLLIUM	_____
CALCIUM	_____
COPPER	_____
MAGNESIUM	_____
MOLYBDENUM	_____
NICKEL	_____
POTASSIUM	_____
SILICON	_____
SODIUM	_____
THALLIUM	_____
TIN	_____
VANADIUM	_____
ZINC	_____

NON-METALS	WT%
SULFUR	_____
BROMINE	_____
CHLORINE	_____
FLUORINE	_____
IODINE	_____
	PPM
AMMONIA	_____
REACTIVE SULFIDE	_____
CYANIDE-TOTAL	_____
CYANIDE AMENABLE	_____
CYANIDE REACTIVE	_____

ORGANIC

VOLATILE COMPOUNDS		REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l
D018	BENZENE	0.5	_____	_____
D019	CARBON TETRACHLORIDE	0.5	_____	_____
D021	CHLOROBENZENE	100.0	_____	_____
D022	CHLOROFORM	6.0	_____	_____
D028	1,2-DICHLOROETHANE	0.5	_____	_____
D029	1,1-DICHLOROETHYLENE	0.7	_____	_____
D035	METHYL ETHYL KETONE	200.0	_____	_____
D039	TETRACHLOROETHYLENE	0.7	_____	_____
D040	TRICHLOROETHYLENE	0.5	_____	_____
D043	VINYL CHLORIDE	0.2	_____	_____

SEMI-VOLATILE COMPOUNDS		REGULATORY LEVEL (mg/l)	TCLP	TOTAL
D023	o-CRESOL	200.0	_____	_____
D024	m-CRESOL	200.0	_____	_____
D025	p-CRESOL	200.0	_____	_____
D026	CRESOL (TOTAL)	200.0	_____	_____
D027	1,4-DICHLOROBENZENE	7.5	_____	_____
D030	2,4-DINITROTOLUENE	0.13	_____	_____
D032	HEXACHLOROBENZENE	0.13	_____	_____
D033	HEXACHLOROBUTADIENE	0.5	_____	_____
D034	HEXACHLOROETHANE	3.0	_____	_____
D036	NITROBENZENE	2.0	_____	_____
D037	PENTACHLOROPHENOL	100.0	_____	_____
D038	PYRIDINE	5.0	_____	_____
D041	2,4,5-TRICHLOROPHENOL	400.0	_____	_____
D042	2,4,6-TRICHLOROPHENOL	2.0	_____	_____

PESTICIDES AND HERBICIDES		REGULATORY LEVEL (mg/l)	TCLP mg/l	TOTAL mg/l
D012	ENDRIN	0.02	_____	_____
D013	LINDANE	0.4	_____	_____
D014	METHOXYCHLOR	10.0	_____	_____
D015	TOXAPHENE	0.5	_____	_____
D016	2,4-D	10.0	_____	_____
D017	2,4,5-TP (SILVEX)	1.0	_____	_____
D020	CHLORDANE	0.03	_____	_____
D031	HEPTACHLOR (AND ITS EPOXIDE)	0.008	_____	_____

OTHER

PHENOL _____PPM
TOTAL PETROLEUM HYDROCARBONS (SOILS ONLY)_____ PPM
PCB'S
☐ NONE
☐ < 50 PPM
☐ ≥ 50 PPM
IF PCB'S ARE PRESENT <50 PPM, IS THE WASTE REGULATED BY TSCA 40 CFR 761?
☐ YES ☐ NO

HOC'S
☐ NONE
☐ < 1000 PPM
☐ ≥ 1000 PPM

OTHER HAZARDS	YES		YES
WATER REACTIVE	☐	PESTICIDE	☐
RADIOACTIVE	☐	HERBICIDE	☐
DIOXIN	☐	EXPLOSIVE	☐
OSHA REGULATED CARCINOGENS	☐	SPONTANEOUSLY IGNITES WITH AIR	☐

	YES		YES
SHOCK SENSITIVE	☐	DEA REGULATED SUBSTANCE	☐
THERMALLY SENSITIVE	☐	OXIDIZER	☐
INFECTIOUS, PATHOGENIC, OR ETIOLOGICAL AGENT	☐	REDUCING AGENT	☐
ASBESTOS	☐	NONE OF THE ABOVE	☐

DOES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED? YES ☐ NO ☐ (If yes, explain)

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CleanHarbors
ENVIRONMENTAL SERVICES, INC.

Profile Number CH 195752

F. REGULATORY STATUS

Y N

☐ ☐ USEPA HAZARDOUS WASTE? (IF Yes List codes.) _____

☐ ☐ DO ANY GENERATOR STATE WASTE CODES APPLY? IF YES, LIST STATE CODES _____

LIST ANY FEDERAL OR STATE WASTE CODES WHICH MAY VARY FROM SHIPMENT TO SHIPMENT: _____

WILL THE DECISION TO VARY THESE WASTE CODES BE BASED ON ☐ KNOWLEDGE OR ☐ TESTING (check one).
IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE: _____

☐ ☐ IS THIS WASTE PROHIBITED FROM LAND DISPOSAL WITHOUT FURTHER TREATMENT PER 40 CFR PART 268?
THIS WASTE IS A: ☐ WASTEWATER ☐ NON WASTEWATER PER USEPA DEFINITION IN 40 CFR 268.2.

☐ ☐ IF ANY WASTE CODES D001, D002, D003 (OTHER THAN REACTIVE CYANIDE OR REACTIVE SULFIDE), D004-D011, D012-D017 NON-WASTEWATERS, OR D018-D043 APPLY, ARE THERE ANY UNDERLYING HAZARDOUS CONSTITUENTS (UHC'S) PRESENT ABOVE UNIVERSAL TREATMENT STANDARDS (UTS)?

☐ ☐ DOES TREATMENT OF THIS WASTE GENERATE A F006 OR F019 SLUDGE?

☐ ☐ IS THIS WASTE SUBJECT TO CATEGORICAL PRETREATMENT DISCHARGE STANDARDS?
IF YES, SPECIFY POINT SOURCE CATEGORY LISTED IN 40 CFR PART 401. _____

☐ ☐ IS THIS WASTE REGULATED UNDER THE BENZENE NESHAP RULES? (IS THIS WASTE FROM A CHEMICAL MANUFACTURING, COKE BY-PRODUCT RECOVERY, OR PETROLEUM REFINERY PROCESS?)

☐ ☐ DOES THIS WASTE CONTAIN VOC'S IN CONCENTRATIONS ≥ 500 PPM?

☐ ☐ DOES THIS WASTE CONTAIN GREATER THAN 20% OF ORGANIC CONSTITUENTS WITH A VAPOR PRESSURE ≥ .3KPA (.044 psia)?

☐ ☐ DOES THIS WASTE CONTAIN AN ORGANIC CONSTITUENT WHICH IN ITS PURE FORM HAS A VAPOR PRESSURE GREATER THAN 77 KPa (11.2psia)?

G. D.O.T. INFORMATION: List all shipping names that may be used. Attach additional page if necessary.

D.O.T. SHIPPING NAME _____

_____ DOT HAZARD CLASS: _____

UN/NA #_____ PACKING GROUP (Circle 1) I II III HAZARD ZONE (Circle 1) A B C D
WILL THIS SHIPPING NAME VARY? ☐ Y ☐ N IF YES, WILL ASSIGNMENT OF PROPER SHIPPING NAME BE BASED ON ☐ KNOWLEDGE OR ☐ TESTING? (check one) IF KNOWLEDGE, DESCRIBE BASIS OF KNOWLEDGE: _____

H. TRANSPORTATION REQUIREMENTS

ESTIMATED SHIPMENT FREQUENCY: ☐ ONE TIME ☐ WEEKLY ☐ SEMI-MONTHLY ☐ MONTHLY ☐ QUARTERLY ☐ OTHER _____

☐ BULK LIQUID

GALLONS/SHIPMENT: _____GAL.
_____ FROM TANKS: TANK SIZE _____GAL.
_____ FROM DRUMS
VEHICLE TYPE:
_____ VAC TRUCK
_____ TANK TRUCK
_____ RAILROAD TANK CAR
CHECK COMPATIBLE STORAGE MATERIALS:
_____ STEEL ___STAINLESS STEEL (316)
_____ RUBBER LINED ___FIBERGLASS LINED
_____ OTHER _____

☐ BULK SOLD

_____TON/YD PER SHIPMENT
STORAGE CAPACITY _____TON/YD
VEHICLE TYPE:
_____ DUMP TRAILER
_____ ROLL OFF BOX
_____ INTERMODAL ROLLOFF BOX
_____ CUSCO/VACTOR
_____ OTHER _____

☐ CONTAINERIZED

_____CONTAINERS/SHIPMENT
STORAGE CAPACITY: _____ CONTAINERS
CONTAINER TYPE:
_____ CUBIC YARD BOX
_____ PALLET
_____ TOTE TANK
_____ DRUM SIZE: _____
CONTAINER MATERIAL:
_____ STEEL
_____ FIBER
_____ PLASTIC
_____ OTHER _____

I. SAMPLE STATUS

REPRESENTATIVE SAMPLE HAS BEEN SUPPLIED. ☐ YES ☐ NO SAMPLED BY _____ DATE SAMPLED _____

J. SPECIFIC DISPOSAL RESTRICTIONS OR REQUESTS: _____

SPECIAL WASTE HANDLING REQUIREMENTS: _____

OTHER COMMENTS OR REQUESTS: _____

K. BIENNIAL/ANNUAL REPORTING INFORMATION.

SIC CODE _____ SOURCE CODE _____ FORM CODE _____ ORIGIN CODE _____

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and attached documents is correct to the best of my knowledge. I also certify that any samples submitted are representative of the actual waste. If Clean Harbors discovers a discrepancy during the approval process, Generator grants Clean Harbors the authority to amend the profile, as Clean Harbors deems necessary, to reflect the discrepancy.

AUTHORIZED SIGNATURE	NAME (PRINT)	TITLE	DATE
_____	_____	_____	_____

FOR CLEAN HARBORS USE ONLY

CHI REPRESENTATIVE COMPLETING PROFILE: _____

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APPENDIX E: PCB GUIDANCE DOCUMENT

Labeling and Marking Requirements

Each generator offering a hazardous material for transportation shall mark and label packages in accordance with 49 CFR 172, 40 CFR 761.65(c)(8), and Clean Harbors policies.

- Markings and labels must be clear and visible.
- Each continaer must be marked with the Date-of-Removal-From-Service for Disposal (Out-of-Service Date) or OSD.
- The Generator Unique Identification Number for the container (a generator supplied serial number).
- The generator name must be on the container. (The label is sufficient.)
- The profile number.
- A PCB marking shall be placed on every PCB package. Either the M_L or the M_S marking shall be used.
    - M_L – This label should always be used unless it cannot fit. Two sizes are available (6" x 6" or 2" x 2").
    - M_S – If the item is too small to use the M_L label (6" x 6"), then the small marking, M_S, is used.

Container Condition

No residue may be present on the exterior of the container. If the container is deemed to be contaminated, the container will be overpacked or de-contaminated at the expense of the customer.

Transportation When on Clean Harbors Equipment

Liquid PCBs must be shipped in secondary containment, such as closed vans. Necessary Emergency Response equipment includes, but is not limited to, a salvage drum and absorbent for all PCB shipments. PCBs shall not be double stacked during transportation.

Required Shipping Paperwork

- PCBs must be manifested in kilograms (K).
- The PCB Continuation Sheet must be completed with a separate line for each package.
    - The Generator's Unique Identification Number
    - The facility Unique Identification Number (assigned upon arrival)
    - The profile number
    - The type of PCB item
    - A description of the contents
    - The weight in kilograms (K).
    - Date-of-Removal-from-Service
- Refer to the SOP.

Discrepancy Resolution

Generator authorization is required for any discrepancies, changes, cross-outs or additions to the shipping paperwork. All PCB containers must be weighed as manifest discrepancies for weight differences of greater than 10% apply for bulk and non-bulk containers regardless.

Surcharges

Surcharges may be assessed for paperwork discrepancies, poor container condition, or any of the non-conformities referenced in the SOP or above.

Elapsed Time from Date-of-Removal-from-Service to Received Date at Disposer	Surcharge to the Customer
Less than 9 months	None
Between 9 months and 12 months	Surcharge because Disposer only has 90 days to get a Certificate of Disposal back to generator.
After 1 year*	Surcharge because Disposer only has 90 days to get a Certificate of Disposal back to generator.

* Note: This is only in the event that the material, as received, is > 1 year

California Regulated PCB versus TSCA Regulated PCB

Generally TSCA only regulates PCB waste which contains more than 50 ppm of PCBs. Exceptions to this include the following:

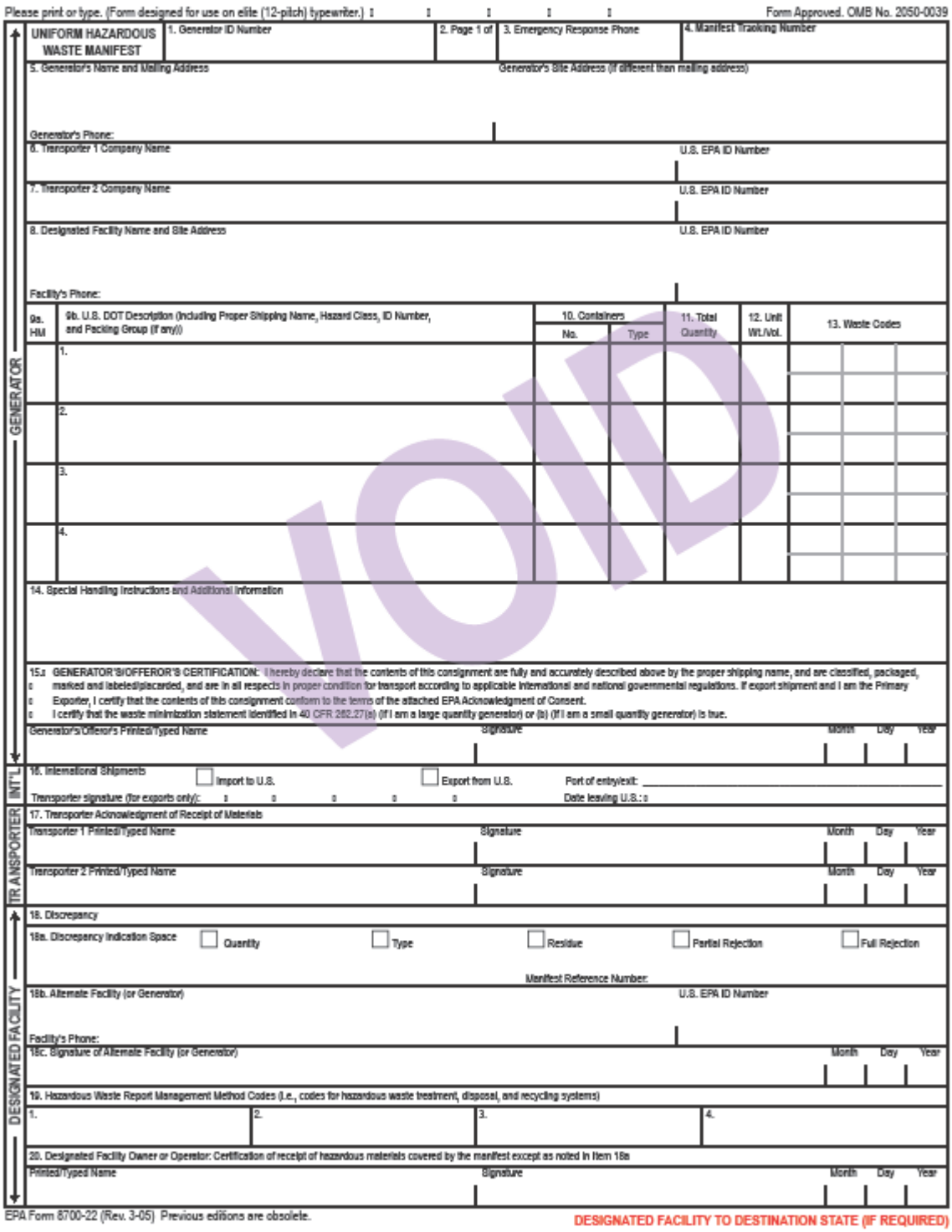
- Any waste that has or had 50 ppm or more of PCB is always treated as if it contained more than 50 ppm, even if the concentration later drops below 50 ppm.
- If a waste concentration originally exceeds 50 ppm of PCB, then any resulting waste from dilution, spills, or leaks is regulated as if it were its original concentration. TSCA prohibits dilution of a PCB waste to avoid regulation.

California regulates PCB waste if it contains 5 ppm or greater of PCBs.

Sources for Additional Information

- Clean Harbors Los Angeles, LLC - PCB Commercial Storer Permit
- 40 CFR 761

APPENDIX F: PCB MANIFEST AND CONTINUATION SHEET



Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number | 2. Page 1 of | 3. Emergency Response Phone | 4. Manifest Tracking Number

GENERATOR

5. Generator's Name and Mailing Address — Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name — U.S. EPA ID Number

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address — U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.					
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name — Signature — Month Day Year

INT'L

16. International Shipments — Import to U.S. — Export from U.S. — Port of entry/exit:

Transporter signature (for exports only): — Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name — Signature — Month Day Year

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space — Quantity — Type — Residue — Partial Rejection — Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. | 2. | 3. | 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number | 22. Page | 23. Manifest Tracking Number

24. Generator's Name

25. Transporter _____ Company Name | U.S. EPA ID Number

26. Transporter _____ Company Name | U.S. EPA ID Number

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes

32. Special Handling Instructions and Additional Information

GENERATOR

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

34. Transporter _____ Acknowledgment of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)