



# MKM Engineers, Inc.

*Safe, Quality Work Performed With Pride*

- *Facility Management*

May 16, 2005

Mr. Steve Chandler  
Minerva Enterprises  
9000 Minerva Road  
P.O. Box 709  
Waynesburg, Ohio 44686

**Subject: Disposal of Painted Demolition Debris With Applied Dried Paint Containing Polychlorinated Biphenyl Concentrations Greater than 50 Part Per Million.**

Dear Mr. Chandler,

- *Turnkey Environmental*

MKM Engineers, Inc. (MKM) plans to use your disposal facility for the disposal of painted demolition debris, including brick, wood, and steel materials. The demolition debris was generated as a result of demolition efforts conducted at Load Lines 2, 3, 4, 6, and 11 located at the Ravenna Army Ammunition Plant, in Ravenna, Ohio. The demolition debris is painted with a paint known to contain polychlorinated biphenyls (PCBs) at concentrations in excess of 50 parts per million (ppm). The Toxic Substance Control Act (TSCA), which became law in 1976, prohibits the manufacture of PCBs, controls the phase out of their existing uses, and sees to their safe disposal. The regulatory requirements that apply to materials containing PCBs depend in part on the PCB concentration.

- *Unexploded Ordnance*

The dried applied paint on the demolition debris containing PCB concentrations greater than 50 ppm is defined as a PCB Bulk Product Waste in accordance with 40 CFR Section 761.3. TSCA, in 40 CFR 761.72 provides for four (4) disposal options for PCB Bulk Product Waste: (1) performance-based, (2) solid waste landfill cover, (3) landfill cover or roadbed, and (4) risk-based option. As such, a PCB Bulk Product Waste presumed to leach <10 µg of PCBs/L may be disposed of in a solid waste landfill, provided it is permitted, licensed, or registered by a state as a municipal or non-municipal, non-hazardous waste landfill [40 CFR 761.62(b)(1)]. Waste presumed to leach <10 µg of PCBs/L by the TSCA are those in which PCBs are tightly bound within a matrix, including but not limited to *applied dry paints*, such as the paint applied to the demolition debris requiring disposal. MKM has satisfied the waste acceptance criteria of your facility (see attached correspondence letter to OEPA) and will ship the PCB bulk product waste to your facility for proper management and disposal.

- *Radiological Services*



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The requirements set forth in 40 CFR 761.62 (b)(4)(i) require any person disposing of PCB bulk product waste regulated under 40 CFR 761.62(b)(1) to provide written notification to the disposal facility a minimum of 15 days in advance of shipment. MKM is providing to Minerva Enterprises, with this letter, the 15 day advance shipment notification for disposal of the PCB bulk product waste (painted demolition debris) at your facility.

MKM anticipates shipping the painted demolition debris to your disposal facility June 8, 2005. Should you have any questions or require additional information, please feel free to contact me directly at the Ravenna field office at 330-358-2920.

Respectfully,

A handwritten signature in blue ink, appearing to read "B. Stockwell", is written over a light blue horizontal line.

Brian Stockwell  
Project Manager  
MKM Engineers, Inc.



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November 15, 2004

Annette DeHavilland  
Division of Solid & Infectious Waste  
Processing and Engineering Unit  
Ohio Environmental Protection Agency  
122 South Front Street  
Columbus, Ohio 43215

**Subject: Disposal of Demolition Debris With Applied Dried Paint Containing Polychlorinated Biphenyl (PCB) Concentrations Greater than 50 Parts Per Million.**

- *Turnkey Environmental*

Dear Ms. DeHavilland:

This letter has been prepared to document discussions between Ohio Environmental Protection Agency (OEPA) and MKM Engineers, Inc., (MKM) relative to the proper disposition of demolition debris that exhibits a layer of an applied dry paint with PCB concentrations in excess of 50 parts per million. The demolition debris (transite roof panels [non-friable asbestos], concrete, brick, block, etc.) will be generated during future building demolition operations at Load Line 11 located at the Ravenna Army Ammunition Plant (RVAAP), in Ravenna, Ohio.

- *Unexploded Ordnance*

The Toxic Substance Control Act (TSCA) regulates the safe disposal of PCBs. The regulatory requirements that apply to materials containing PCBs depend in part on the PCB concentration. The applied dry paint on demolition debris containing PCB concentrations greater than 50 ppm is defined as a PCB Bulk Product Waste in accordance with 40 CFR Section 761.3. TSCA, 40 CFR 761.62 provides for four (4) disposal options for PCB Bulk Product Waste: (a) performance-based, (b) in solid waste landfills, (c) risk based disposal, and (d) daily landfill cover or roadbed. 40 CFR 761.62(b)(1)(i) goes on to list the types of PCB Bulk Product Waste that may be disposed of in a solid waste landfill, provided it is permitted, licensed, or registered by a state as a municipal or non-municipal, non-hazardous waste landfill. Among the different types listed are applied dry paints, such as the paint applied to the demolition debris requiring disposal.

- *Radiological Services*

With regard to above referenced TSCA regulations, it was unclear as to whether a construction and demolition debris (C&DD) landfill is considered a viable option





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for disposal of a PCB Bulk Product Waste in the state of Ohio. As such, I contacted the OEPA on Wednesday, November 9, 2004 for clarification.

During your return call on Wednesday, November 10, 2004, we discussed that the OEPA solid waste regulations allow for PCB Bulk product waste to be disposed of in a C&DD landfill. Stating that C&DD landfills are solid waste landfills licensed by the state of Ohio, state regulations do not prohibit this waste stream from being disposed as C&DD.

Based upon this information MKM anticipates shipping painted transite roofing panels to a state of Ohio licensed C&DD facility beginning the week of November 22, 2004. Should you have any questions or require additional information, please feel free to contact me or Brian Stockwell at the Ravenna field office at 330-358-2920.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark Lamb", is written over a light blue horizontal line.

Mark Lamb  
Senior Project Manager  
MKM Engineers, Inc.

cc: Richard Callahan (MKM)  
Brian Stockwell (MKM)  
Mark Patterson (RVAAP)  
Irv Venger (RVAAP)  
Eileen Mohr (OEPA)  
Todd Fisher (OEPA)  
Shahrukh Kanga (PIKA International, Inc.)



# RECORD OF TELEPHONE CONVERSATION

DATE: 11-17-04 TIME: 11:00 JOB NO.: 04-09-0019

RECORDED BY: Brian Stockwell OWNER/CLIENT: \_\_\_\_\_

TALKED WITH: Annette Deltavilland OF OEPA

NATURE OF CALL: INCOMING  OUTGOING  PHONE \_\_\_\_\_

ROUTE TO:	INFORMATION	ACTIONS
_____	_____	_____
_____	_____	_____
_____	_____	_____

MAIN SUBJECT OF CALL: LL 11 Painted (PCB) Demo Debris

ITEMS DISCUSSED: Annette called + let me (+ Mark Lamb)  
Know she received our letter summarizing  
OEPA + MKM conversation on proper disposal  
of PCB Bulk Product waste that she  
had one question - just wanted to be sure  
we were aware of the 15-day notice  
letter for to the disposal facility required  
by TSCA - we informed her we indeed  
have indeed previously sent out a letter to  
the disposal facility -