



Explanation of Significant Differences to the Record of Decision for Potential Source of Contamination 16 Former Building 7100 PCB Area Marine Corps Logistics Base Albany, Georgia

SUMMARY OF EXPLANATION OF SIGNIFICANT DIFFERENCES

The Navy is modifying the selected remedial action for Potential Source of Contamination (PSC) 16 – Former Building 7100 Polychlorinated Biphenyl (PCB) Area at Marine Corps Logistics Base (MCLB) Albany in Albany, Georgia as documented in the August 1992 Interim Record of Decision (1992 IROD) and August 1997 Record of Decision (1997 ROD), as described below.

PCB-impacted subsurface soil was left in place following a 1990 soil removal action. The selected remedy for PSC 16 as outlined in the 1992 IROD included the installation of a multilayer cap, implementation of Land Use Controls (LUCs) to restrict access to impacted subsurface soils and conducting groundwater monitoring. The 1997 ROD further supplemented the interim remedial action by requiring the implementation of land-use restrictions, specifically at PSC 16, through the MCLB Albany Master Plan. The 1997 ROD also required that groundwater beneath OU3 be addressed under a continuing basewide investigation within OU6, including the groundwater monitoring associated with the PSC 16 multilayer cap. In March 2000, the U.S. Environmental Protection Agency (U.S. EPA) approved discontinuing groundwater monitoring as post-ROD monitoring did not detect site-related constituents.

As a result of the demolition of adjoining Building 7100 compromising the quality of the existing cap, and confirmation that no site-related constituents are present just outside of the cap, the Navy proposed to excavate and dispose the residual PCB-impacted soil beneath the cap. The remedy modification described in the ESD will achieve the Remedial Action Objectives (RAOs) from the 1992 IROD to remove any PCB contaminated soil above 1 part per million (ppm) and thereby support a finding that PSC 16 is suitable for unrestricted use/unlimited exposure (UU/UE).

INTRODUCTION

This Explanation of Significant Differences (ESD) documents significant changes to the remedy established in the 1992 IROD and 1997 ROD.

As reflected in the July 1991 Federal Facilities Agreement, the Navy serves as the lead agency with oversight from the U.S. EPA and Georgia Environmental Protection Division (GEPD) for cleanup of sites at MCLB Albany in the Navy Installation Restoration (IR) Program under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as modified by the Superfund Amendments and Reauthorization Act (SARA). This ESD has been prepared in accordance with CERCLA Section 117(c) and NCP Section 300.435(c)(2)(i) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), and the IR Program. In accordance with Section 300.825(a) (2) of the NCP, this ESD will become part of the Administrative Record file for the facility. The Administrative Record also contains background information that was used in determining the original remedy, as documented in the ROD, and in preparing this ESD.

The Navy has determined that since the adjacent building (former Building 7100) has been demolished, contaminated soil remaining at PSC 16 with PCBs at 1 ppm or above is accessible for excavation and disposal. Along with the confirmation that no contamination is present in the groundwater, the excavation of the residual PCB-contaminated soil will support a determination that PSC 16 is suitable for UU/UE. This ESD summarizes the information that led to making the decision to alter the PSC 16 remedy, describes the changes, and affirms that the revised remedy complies with the NCP and the requirements of CERCLA and SARA.

This ESD and supporting documentation will become part of the Administrative Record for MCLB Albany and will be included in the Public Information Repository, in accordance with Section 300.825(a)(2) of the NCP. The Administrative Record contains background information that was used in determining the selected remedy, as documented in the ROD, and in preparing this ESD.

The Information Repository for MCLB Albany is available for public review at the following location:

Dougherty County Public Library

300 Pine Avenue
Albany, Georgia 31701

Hours of Availability

Monday to Wednesday - 10:00 AM to 8:00 PM
Thursday to Friday - 10:00 AM to 6:00 PM
Saturday - 10:00 AM to 5:00 PM
Sunday - 2:00 PM to 6:00 PM

SITE DESCRIPTION AND HISTORY

MCLB ALBANY

MCLB in Albany, Georgia, is a supply and logistics facility for the United States Marine Corps (USMC) located in southwestern Georgia (Figure 1). In March 1952, MCLB Albany was commissioned as the Marine Corps Depot of Supplies. In 1954, the station assumed supply support for the Marine Corps in all mainland areas east of the Rocky Mountains and in the Atlantic Coast areas. In 1967, the facility became a storage activity and depot maintenance activity center. Formal training in maintenance and supply sources of various types was conducted as part of the facility mission. Currently, operations at the facility include receiving, repairing, and distributing equipment.

MCLB Albany is located on approximately 3,619 acres and is entirely fenced with access being controlled at three guarded gates. The land adjacent to MCLB Albany is predominantly rural and agricultural, with the exception of large residential areas north of PSC 3 along Ramsey Road and near the Johnson Road gate on the northwest corner of the base. A residential property is also located southwest of the base along Fleming Road. There are no known community or county development plans to change the land use surrounding MCLB Albany.

MCLB Albany was placed on the National Priorities List (NPL) in December 1989 due to contamination resulting from installation activities.

PSC 16

PSC 16 comprises of an asphalt-covered area located adjacent to former Building 7100 (dining hall) and is the former location of an electrical PCB transformer which sat on a supporting concrete pad (Figure 2). In 1990, during an inspection conducted as part of a PCB transformer change-out program, transformer oil was observed to have leaked onto the supporting concrete pad.

The PCB transformer was decommissioned in 1988 as part of a basewide inspection to identify PCB transformers and to remove all leaking transformers. Building 7100 was demolished in 2008. Currently, PSC 16 is entirely fenced and covered with an asphalt pad (cap) located 40 feet west of an asphalt-paved parking lot, approximately 200 feet east of bachelor enlisted quarters (Figure 2). According to a 1996 survey, the cap measured approximately 14.6 feet by 21 feet; however, measurements taken during a June 2017 site visit indicate that additional asphalt was added to the south of the existing cap. The entire asphalt-covered area measures approximately 14.6 feet by 31.5 feet. Currently, there are no anticipated changes to future use.

Suspected Sources of Soil Contamination

PSC 16 is the former location of an electrical transformer and supporting concrete pad. During an inspection conducted as part of a PCB transformer change-out program, evidence of leakage of transformer oil was observed on the concrete pad beneath the transformer. As a result, contamination was detected in the subsurface soil.

In 1990, PCB-contaminated soils were removed to 44 inches below ground surface (bgs). The removal activities were terminated at this depth as the foundation of the adjoining Building 7100 prevented access to the residual PCB-contaminated soils. Data from the 1992 Remedial Investigation and Feasibility Study (1992 RI/FS) indicated that PCB contamination originating from the transformer leak may be present beneath the Building 7100 foundation. The 1992 RI/FS further determined that residual PCB-impacted soils were present below the depth achieved during the removal activities to at least 10 feet bgs.

To address the residual soil contamination, the 1992 IROD presented remedial alternatives and corresponding estimated costs which are summarized below in the following table:

Alternative	Estimated Capital Cost
1: No Action	\$0
2: Limited Action Maintenance of fencing, monitoring groundwater, and implementation of land use restrictions	Capital: \$28,100 Operational and Maintenance: \$37,000 Present Worth: \$188,300
3: Multilayer Cap Construction of an impermeable clay liner and membrane liner, reinstallation of fencing, implementation of land use restrictions, and monitoring groundwater	Capital: \$64,700 Operational and Maintenance: \$41,500 Present Worth: \$242,200

Alternative	Estimated Capital Cost
4A: Excavation and Incineration Excavation and incineration of contaminated soils	Capital: \$327,800 Present Worth: \$327,800
5A: Excavation and Disposal Excavation and off-site disposal of contaminated soils	Capital: \$198,200 Present Worth: \$198,200

Soil Contaminants of Concern

The Contaminant of Concern identified at PSC 16 is PCB congener, Aroclor 1260.

SUMMARY OF THE PSC 16 SOIL SELECTED REMEDY

The selected remedy for PSC 16 was documented in the 1992 IROD and is summarized below:

- Excavation and off-base disposal of sediment in the bottom of the catch basin adjacent to PSC 16;
- Installation of a multilayer cap over the surface area, including a flexible membrane liner, sand drainage layer, gravel layer, and bituminous concrete surface layer;
- Reinstallation and maintenance of security and fencing;
- Implementation of land-use restrictions on future activities with the source area; and
- Installation of monitoring wells and monitoring of groundwater quality.

The RAOs of the selected remedy are to:

- Control the release of hazardous substances;
- Minimize the potential direct exposure to hazardous materials;
- Control the potential for releases of hazardous substance to the groundwater; and
- Collect data on aquifer and contaminant response to remediation measures.

In addition, the 1997 ROD required the following remedial actions to supplement the interim remedy:

- Implementation of land-use restrictions to be enforced at PSC 16 via MCLB Albany's Base

Master Plan document; and

- Implementation of an institutional control plan (ICP) to ensure future protection of the cap constructed at PSC 16 which restricts construction and storage activities at PSC 16 and limited physical access to the property.

As the selected remedy (as amended in 1997) resulted in hazardous substances remaining on-site above health-based levels, a Five-Year Review (FYR) was also required to be conducted to ensure that the remedy remained protective of human health and the environment.

BASIS FOR THIS EXPLANATION OF SIGNIFICANT DIFFERENCES

The 2016 FYR (2016 FYR) identified concerns that residual PCB contamination outside the existing cap footprint may have been exposed with the demolition of the adjacent Building 7100 and removal of adjacent impermeable surfaces. The 2016 FYR also identified concerns regarding the integrity of the cap, which is required to be inspected per the IROD and ROD to ensure remedy protectiveness. In response, the Navy decided to evaluate whether removing the cap and excavating the residual PCB-impacted soils is feasible. In 2017, the Navy conducted an investigation to characterize the extent of PCB-impacted soils around the cap and within the footprint of former Building 7100. The investigation determined that PCB-contaminated soils were not present above detection levels in samples collected from just outside the cap or beneath the cap at 14 feet bgs.

Groundwater monitoring conducted semiannually between July 1996 and April 1999 confirmed that PCBs were not detected in groundwater. As a result, the Navy requested to discontinue groundwater monitoring at PSC 16. The U.S. EPA approved the request in March 2000.

The excavation of residual PCB-impacted soils above 1 ppm, which is cleanup level for soil without further use restrictions, will eliminate the requirement to maintain LUCs. The proposed excavation will be approximately 26 by 17 feet and extend to 14 feet bgs totaling approximately 230 cubic yards. Confirmation that no contamination is present in the groundwater media above drinking water standards supports a finding that no response action is necessary. The proposed remedy modification along with the confirmation of no actionable groundwater contamination is present in the PSC 16 footprint will achieve the RAOs; thus, resulting in the determination that PSC 16 is suitable for UU/UE and supports a delisting from the NPL when that process is pursued at a later date.

DESCRIPTION OF SIGNIFICANT DIFFERENCES

SCOPE

According to the NCP, any changes to a remedy selection are required to be evaluated to determine whether the modification is minor, significant, or fundamental. Factors that are to be evaluated include:

- Does the change alter the scope of the selected remedy (i.e. physical area of the response, remediation goals, type and volume of wastes)?
- Does the change alter the performance and resulting protectiveness of the selected remedy?
- Does the change alter the costs as compared to the selected remedy?

This ESD presents the modified remedy which was included as a remedial alternative in the 1992 RI/FS, Alternative 5A, and is presented in the table above. The estimated area of excavation is depicted in Figure 3. The modified remedy will consist of the following:

- Removal of the existing engineered cap and security fencing;
- Excavation of approximately 230 cubic yards of PCB-contaminated soil that exceeds the cleanup level of 1 ppm (which is based upon residential use);
- Collection of soil confirmation samples;
- Characterization and segregation of excavated PCB-contaminated soil. Contaminated soil with ≥ 50 milligrams per kilogram [mg/kg or ppm] PCBs is regulated for disposal under TSCA as PCB waste. Soil < 50 ppm is considered PCB remediation waste.
- TSCA regulations at 40 CFR 761.61(a)(4)(i)(A) that specifies a cleanup level of 1 ppm or less without further restrictions for high occupancy areas (e.g., residential land use) is considered an Applicable or Relevant and Appropriate Requirements (ARARs) consistent with CERCLA 121(d) and the NCP.
- Offsite disposal of the PCB-contaminated soil at a landfill facility that is permitted to take the contaminated soils. TSCA PCB wastes will be disposed of at U.S. EPA approved TSCA PCB

chemical waste disposal facility in accordance with performance-based disposal requirements for PCB remediation waste at 40 CFR 761.61(b)(2)(i) that is a 'relevant and appropriate' requirement; and

- Backfill of the excavated area with certified clean fill.

Does the change alter the scope of the selected remedy (i.e. physical area of the response, remediation goals, type and volume of wastes)?

The modified remedy will not significantly alter the scope of the selected remedy as the area of concern remains within the PSC 16 boundary and Aroclor-1260 remains the COC for the site. The volume of PCB-impacted soil anticipated to be excavated as a part of the modified remedy is relatively comparable to the estimated volume presented in the 1992 IROD.

Does the change alter the performance and resulting protectiveness of the selected remedy?

The change does alter the performance and resulting protectiveness in considering that all contamination is addressed and no residual contamination above 1 ppm PCB will remain. However, Alternative 5A was not selected as the remedy as the PCB-impacted soils were not accessible with the presence of Building 7100.

Does the change alter the costs as compared to the selected remedy?

The cost of the modified remedy, which is discussed further in the ESD, is comparable to the cost presented in the 1992 IROD for Alternative 5A.

In considering these factors, the modified remedy does present significant changes to the selected remedy largely based on the performance and protectiveness. The selected remedy resulted in residual PCB-impacted soils and maintenance of LUCs while the modified remedy will result in no residual PCB-impacted soil above 1 ppm (which is a cleanup level for use without further restrictions) and therefore, will not require the maintenance of LUCs or FYRs. The modified remedy will further achieve in the attainment of UU/UE and support deletion of PSC 16 from the NPL when that process is pursued. Remedial actions at PSC 16 are expected to be complete by December 2018.

This ESD also formally documents the discontinuation of groundwater monitoring from PSC 16, approved previously in March 2000.

PERFORMANCE

The PSC 16 soil remedial action, with modifications specified in this ESD, will meet all ARARs and RAOs identified in the ROD. Specifically, the removal of the PCB contaminated soil above 1 ppm will eliminate the potential contact or disturbance of contaminated soil that could present an unacceptable risk to human health and will allow for UU/UE

The RAOs for the modified remedy are identical to those presented in the 1992 IROD and 1997 ROD. However, there are new ARARs associated with excavation, characterization, temporary storage and off-site disposal of PCB contaminated soil that is considered PCB remediation waste under the TSCA regulations. The TSCA regulations considered ARARs for this response action are included on Table 1 appended to the ESD.

COSTS

Additional costs are required to perform the excavation and offsite disposal, Alternative 5a of the Interim ROD, as well as the supporting documentation. The cost for the soil removal and offsite disposal, plus site restoration is \$357,000.

As no residual contamination will be present, the modified remedy will not require the maintenance or inspection of LUCs.

FYRs for PSC 16 will be discontinued following the 2021 FYR which will document the site's attainment of UU/UE and delisting from the NPL.

SUPPORT AGENCY COMMENTS

U.S. EPA and GEPD representatives have been involved in the decision-making process associated with this ESD and have indicated support for these changes. The Navy has obtained concurrence from U.S. EPA and GEPD on the modification to the PSC 16 remedial actions.

STATUTORY DETERMINATION AFFIRMATION

The proposed changes to the selected remedy described in the 1992 IROD and 1997 ROD for PSC 16 will continue to satisfy all statutory requirements of CERCLA Section 121 and the NCP. The altered remedy remains protective of human health and the environment, complies with federal and state ARARs, and remains cost-effective.

PUBLIC PARTICIPATION

The public participation requirements outlined in Section 300.435(c)(2)(i) of the NCP will be met by including this ESD in the Administrative Record and by publishing a notice of availability for this ESD in a local newspaper, the Albany Herald. The reports and documents referenced in this ESD are available for public review as part of the MCLB Albany Administrative Record and Public Information Repository.

FOR MORE INFORMATION

If you have questions about this ESD, or would like further information about the environmental investigations described herein, please contact the Navy's public affairs office or one of the following site managers:

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Ms. Anna Cornelious
US. EPA Region 4
Project Manager 61 Forsyth Street, SW
Atlanta, Georgia 30303
Phone: 404-562-9435

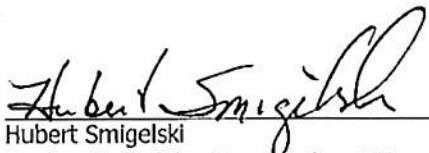
Cornelious.Anna@epa.gov

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Amy.Potter@dnr.ga.gov

DECLARATION AND AUTHORIZING SIGNATURES MORE INFORMATION

For the foregoing reasons, by my signature below, I approve the issuance of this Explanation of Significant Differences for the Record of Decision for Soil at Operable Unit 3, PSC 16, at the Marine Corps Logistics Base Albany in Albany, Georgia.



Hubert Smigelski
By direction of the Commanding Officer
MCLB Albany

9/27/2018
Date



Franklin Hill
Director, Superfund Division
U.S. Environmental Protection Agency, Region 4

9/27/18
Date

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Figures



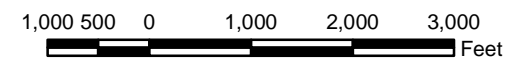
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Figure 1
Site Location Map
Potential Source of Contamination 16
Marine Corps Logistics Base
Albany, Georgia

Legend

- Potential Source of Contamination (PSC) 16
- Installation Boundary



REQUESTED BY: M. Moore	DATE: 3/20/2018
DRAWN BY: N. Rinehart	PROJECT: Z000000001

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Former Building 7100

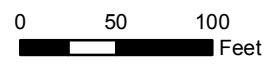
Figure 2
 Site Map
 Potential Source of Contamination 16
 Marine Corps Logistics Base
 Albany, Georgia



REQUESTED BY: M. Moore	DATE: 6/15/2018
DRAWN BY: M. Senne	PROJECT: Z000000001

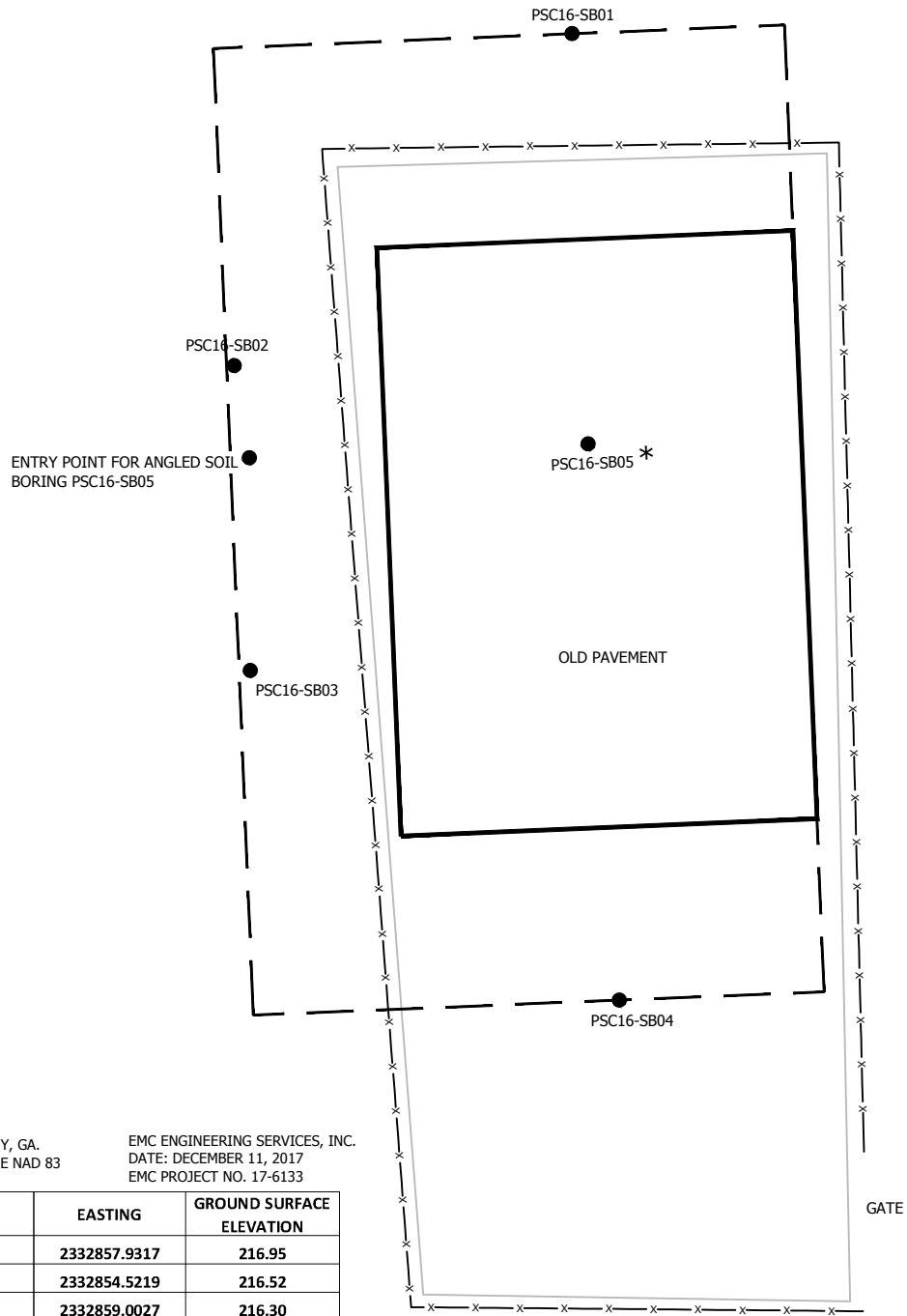
Data Sources: Google Earth Pro Imagery - Dated 12/13/2014

- Potential Source of Contamination (PSC) 16
- Land Use Control Boundary
- Former Building 7100



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BORING LOCATIONS ~ JM73
 MARINE CORPS LOGISTICS BASE - ALBANY, GA. EMC ENGINEERING SERVICES, INC.
 HORIZONTAL DATUM: GA SPC WEST ZONE NAD 83 DATE: DECEMBER 11, 2017
 VERTICAL DATUM: NAVD 1988 EMC PROJECT NO. 17-6133

DESCRIPTION	NORTHING	EASTING	GROUND SURFACE ELEVATION
PSC16-SB01	563629.3746	2332857.9317	216.95
PSC16-SB02	563617.0783	2332854.5219	216.52
PSC16-SB03	563610.1804	2332859.0027	216.30
PSC16-SB04	563607.4591	2332872.0563	216.37
PSC16-SB05	563615.1302	2332856.118	216.44

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LEGEND

- x— FENCE
- 2017 CONFIRMATION SOIL BORING LOCATION
- FORMER EXCAVATION AREA (ESTIMATED)
- - - PROPOSED EXCAVATION BOUNDARY
- * SAMPLE LOCATION FOR SAMPLE PSC16-SB05-1314
- PAVEMENT

NOTES:
 1. CERTAIN DATA SHOWN ON THIS PLAT WAS OBTAINED UTILIZING GPS (GLOBAL POSITIONING SYSTEMS). IT INCLUDES: BASIS OF BEARINGS, HORIZONTAL CONTROL. THE EQUIPMENT USED TO OBTAIN THIS DATA WAS A CHAMPION TKO GPS RECEIVER WITH A SCEPTER II DATA COLLECTOR RECEIVING RTK CORRECTIONS VIA A CELL PHONE FROM THE EGPS SOLUTIONS REAL TIME NETWORK. THE TECHNIQUE USED WAS A RTK CORRECTED MEASUREMENTS FROM A TRIMBLE VRS REAL TIME NETWORK OPERATED BY EGPS SOLUTIONS, INC.
 2. SURVEY WORK COMPLETED DECEMBER 06, 2017.
 3. HORIZONTAL DATUM: GA SPC WEST ZONE NAD83.
 4. VERTICAL DATUM: NAVD 1988.

FIGURE 3
PROPOSED EXCAVATION AREA
POTENTIAL SOURCE OF CONTAMINATION 16
MARINE CORPS LOGISTICS BASE
ALBANY, GEORGIA



REQUESTED BY:	MM	DWG DATE:	21MARCH2018
DRAWN BY:	KMB	PROJECT NO:	0000015344

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Tables



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Table 1
Action-Specific ARARs and TBCs
for PSC 16 Explanation of Significant Differences, MCLB Albany, GA

Action-Specific ARARs			
Action	Requirements	Prerequisite	Citation(s)
<i>General Construction Standards – All land-disturbing activities (i.e., excavation, grading etc.)</i>			
Managing stormwater runoff from land-disturbing activities	Shall implement best management practices, including sound conservation and engineering practices to prevent and minimize erosion and resultant sedimentation, as provided in O.G.C.A. § 12-7-6(b), during excavation activity.	Land-disturbing activity (as defined in O.C.G.A. §12-7-3(9)) of more than one acre of land – applicable Land-disturbing activity (as defined in O.C.G.A. §12-7-3(9)) of less than one acre – relevant and appropriate	GA Erosion and Sedimentation Act O.G.C.A. §12-7-6(b)
	Shall control turbidity of stormwater runoff discharges to the extent the limits in O.C.G.A. § 12-7-6 shall not be exceeded.	Land-disturbing activity (as defined in O.C.G.A. §12-7-3(9)) of more than one acre of land – applicable Land-disturbing activity (as defined in O.C.G.A. §12-7-3(9)) of less than one acre – relevant and appropriate	GA Rule §391-3-7-.06
Managing fugitive dust emissions	Shall take all reasonable precautions to prevent fugitive dust from becoming airborne, including the following precautions: (i) use of water or chemicals for dust control; (ii) application of asphalt, water, or chemicals on surfaces that can give rise to airborne dusts; (iii) installation of hoods, fans, and filters to enclose and vent the handling of dusty materials; (iv) covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and (v) prompt removal of earth or other material from paved streets onto which it has been deposited.	Operations, processes, handling, transportation or storage which may result in fugitive dust – relevant and appropriate	Georgia Air Quality Control Regulations Rule §391-3-1-.02(2)(n)(1)
	Shall not allow the percent opacity from any fugitive dust source to equal or exceed 20 percent		Georgia Air Quality Control Regulations Rule §391-3-1-.02(2)(n)(2)

Table 1
Action-Specific ARARs and TBCs
for PSC 16 Explanation of Significant Differences, MCLB Albany, GA

Action-Specific ARARs			
Action	Requirements	Prerequisite	Citation(s)
<i>Waste Characterization – Primary Wastes (PCB contaminated media and debris) and Secondary Wastes (PPE, etc.)</i>			
Management of PCB waste (e.g., contaminated PPE, equipment, wastewater)	Any person storing or disposing of PCB waste must do so in accordance with 40 CFR 761, Subpart D.	Generation of waste containing PCBs at concentrations \geq 50 ppm – applicable	40 CFR § 761.50(a)
Characterization of PCB remediation waste	Any person cleaning up and disposing of PCBs shall do so based on the concentration at which the PCBs are found.	Generation of PCB remediation waste as defined in 40 CFR 761.3 – applicable	40 CFR § 761.61
<i>Waste Storage – Primary Wastes (PCB contaminated media and debris) and Secondary Wastes (PPE, etc.)</i>			
Temporary storage of PCB waste in a container(s)	Container(s) shall be marked as illustrated in 40 CFR 761.45(a).	Storage of PCBs and PCB Items at concentrations \geq 50 ppm for disposal – applicable	40 CFR § 761.40(a)(1)
	Storage area must be properly marked as required by 40 CFR 761.40(a)(10).		40 CFR § 761.65(c)(3)
	Container(s) shall be in accordance with requirements set forth in DOT HMR at 49 CFR 171-180.		40 CFR § 761.65(c)(6)
Storage of PCB waste in a RCRA-regulated container storage area	Does not have to meet storage unit requirements in 40 CFR § 761.65(b)(1) provided unit: <ul style="list-style-type: none"> • is permitted by EPA under RCRA §3004, or • qualifies for interim status under RCRA §3005; or • is permitted by an authorized state under RCRA §3006 and, • PCB spills cleaned up in accordance with Subpart G of 40 CFR 761. 	Storage of PCBs and PCB Items designated for disposal – applicable	40 CFR § 761.65(b)(2)(i)-(iv)
Temporary storage of bulk PCB remediation waste (e.g., excavated soils) in a TSCA waste pile	Waste must be placed in a pile that: <ul style="list-style-type: none"> • is designed and operated to control dispersal by wind, where necessary, by means other than wetting; • does not generate leachate through decomposition or other reactions; 	Storage of PCB remediation waste or PCB bulk product waste at cleanup site or site of generation for up to 180 days – applicable	40 CFR § 761.65(c)(9)(i) and (ii)

Table 1
Action-Specific ARARs and TBCs
for PSC 16 Explanation of Significant Differences, MCLB Albany, GA

Action-Specific ARARs			
Action	Requirements	Prerequisite	Citation(s)
	The storage site must have a liner designed, constructed, and installed to prevent any migration of wastes off or through liner into adjacent subsurface soil, groundwater or surface water at any time during active life (including closure period) of the storage site.		40 CFR § 761.65(c)(9)(iii)(A)
Construction of TSCA storage pile liner	Liner must be: <ul style="list-style-type: none"> • constructed of materials that have appropriate chemical properties and sufficient strength and thickness to prevent failure because of pressure gradients, physical contact with waste or leachate to which they are exposed, climatic conditions, the stress of installation, and the stress of daily operation; • placed on foundation or base capable of providing support to liner and resistance to pressure gradients above and below the liner to prevent failure because of settlement compression or uplift; • installed to cover all surrounding earth likely to be in contact with waste. 	Storage of PCB remediation waste or PCB bulk product waste at cleanup site or site of generation for up to 180 days – applicable	40 CFR § 761.65(c)(9)(iii)(A)(1)-(3)
Construction of TSCA storage pile cover	The storage site must have a cover that: <ul style="list-style-type: none"> • meets the requirements of 40 CFR § 761.65(c)(9)(iii)(A); • is installed to cover all of the stored waste likely to be contacted by precipitation; and • is secured so as not to be functionally disabled by winds expected under normal seasonal meteorological conditions; and 	Storage of PCB remediation waste or PCB bulk product waste at cleanup site or site of generation for up to 180 days – applicable	40 CFR § 761.65(c)(9)(iii)(B)

Table 1
Action-Specific ARARs and TBCs
for PSC 16 Explanation of Significant Differences, MCLB Albany, GA

Action-Specific ARARs			
Action	Requirements	Prerequisite	Citation(s)
Construction of TSCA storage pile run-on control system	<p>The storage site must have a run-on control system designed, constructed, operated and maintained such that it:</p> <ul style="list-style-type: none"> • prevents flow on the stored waste during peak discharge from at least a 25-year storm; • collects and controls at least the water volume resulting from a 24-hour, 25-year storm. <p>Collection and holding facilities (e.g., tanks or basins) must be emptied or otherwise managed expeditiously after storms to maintain design capacity of the system.</p>	Storage of PCB remediation waste or PCB bulk product waste at cleanup site or site of generation for up to 180 days – applicable	40 CFR § 761.65(c)(9)(iii)(C)(1) and (2)
Modification of TSCA waste pile requirements	Requirements of 40 CFR § 761.65(c)(9) may be modified under the risk-based disposal option of 40 CFR 761.61(c).		40 CFR § 761.65(c)(9)(iv)
<i>Treatment/Disposal of PCB waste (including PCB remediation waste)</i>			
Disposal of decontamination waste and residues	Such waste shall be disposed of at their existing PCB concentration unless otherwise specified in 40 CFR § 761.79(g)(1) – (6).	Decontamination waste and residues – applicable	40 CFR § 761.79(g)
	Shall be disposed of in accordance with provisions for wastes from cleanup of PCB remediation waste at 40 CFR § 761.61(a)(5)(v).	Non-liquid cleaning materials and PPE at any concentration PCBs, including non-porous surfaces and other non-liquid materials (e.g., rags, gloves, booties) resulting from decontamination – applicable	40 CFR § 761.79(g)(6)
Disposal of PCB contaminated porous surfaces (self-implementing option)	Shall be disposed on-site or off-site as bulk PCB remediation waste according to 40 CFR 761.61(a)(5)(i) or decontaminated for use according to 40 CFR 761.79(b)(4).	PCB remediation waste <i>porous surfaces</i> (as defined in 40 CFR 761.3) – relevant and appropriate	40 CFR § 761.61(a)(5)(iii)
Disposal of PCB contaminated non-porous surfaces on-site (self-implementing option)	Shall be cleaned on-site or off-site to levels in 40 CFR 761.61(a)(4)(ii) using: <ul style="list-style-type: none"> • decontamination procedures under 40 CFR 761.79; • technologies approved under 40 CFR 761.60(e); or • risk-based procedures/technologies under 40 CFR 761.61(c). 	PCB remediation waste <i>non-porous surfaces</i> (as defined in 40 CFR 761.3) – relevant and appropriate	40 CFR § 761.61(a)(5)(ii)(A)(1)-(3)

Table 1
Action-Specific ARARs and TBCs
for PSC 16 Explanation of Significant Differences, MCLB Albany, GA

Action-Specific ARARs			
Action	Requirements	Prerequisite	Citation(s)
Disposal of bulk PCB remediation waste off-site (self-implementing option)	May be sent off-site for decontamination or disposal provided the waste is either dewatered on-site or transported off-site in containers meeting the requirements of DOT HMR at 49 CFR parts 171-180.	Generation of bulk PCB remediation waste (as defined in 40 CFR 761.3) for disposal – relevant and appropriate	40 CFR § 761.61(a)(5)(i)(B)
	Shall be disposed of in accordance with the provisions for Cleanup wastes at 40 CFR 761.61(a)(5)(v)(A).	Bulk PCB remediation waste which has been de-watered and with a PCB concentration < 50 ppm – relevant and appropriate	40 CFR § 761.61(a)(5)(i)(B)(2)(ii)
Disposal of bulk PCB remediation waste off-site (self-implementing option)	Shall be disposed of: <ul style="list-style-type: none"> • in a hazardous waste landfill permitted by EPA under §3004 of RCRA; • in a hazardous waste landfill permitted by a State authorized under §3006 of RCRA; or • in a PCB disposal facility approved under 40 CFR 761.60. 	Bulk PCB remediation waste which has been de-watered and with a PCB concentration ≥ 50 ppm – relevant and appropriate	40 CFR § 761.61(a)(5)(i)(B)(2)(iii)
Performance-based disposal of PCB remediation waste	Shall dispose by one of the following methods: <ul style="list-style-type: none"> • in a high-temperature incinerator approved under 40 CFR 761.70(b); • by an alternate disposal method approved under 40 CFR 761.60(e); • in a chemical waste landfill approved under 40 CFR 761.75; • in a facility with a coordinated approval issued under 40 CFR 761.77; or • through decontamination in accordance with 40 CFR 761.79. 	Disposal of non-liquid PCB remediation waste (as defined in 40 CFR 761.3) – relevant and appropriate	40 CFR § 761.61(b)(2) 40 CFR § 761.61(b)(2)(i) 40 CFR § 761.61(b)(2)(ii)
	Shall be disposed according to 40 CFR 761.60(a) or (e) or decontaminate in accordance with 40 CFR 761.79.	Disposal of liquid PCB remediation waste – relevant and appropriate	40 CFR § 761.61(b)(1)

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Action-Specific ARARs			
Action	Requirements	Prerequisite	Citation(s)
Disposal of PCB cleanup wastes (e.g., PPE, rags, non-liquid cleaning materials) (self-implementing option)	Shall be disposed of either: <ul style="list-style-type: none"> • in a facility permitted, licensed or registered by a State to manage municipal solid waste under 40 CFR 258 or non-municipal, non-hazardous waste subject to 40 CFR 257.5 thru 257.30; or • in a RCRA Subtitle C landfill permitted by a State to accept PCB waste; or • in an approved PCB disposal facility; or • through decontamination under 40 CFR 761.79(b) or (c). 	Generation of non-liquid PCBs at any concentration during and from the cleanup of PCB remediation waste – relevant and appropriate	40 CFR § 761.61(a)(5)(v)(A)(1)-(4)
Disposal of PCB cleaning solvents, abrasives, and equipment (self-implementing option)	May be reused after decontamination in accordance with 40 CFR § 761.79; or For liquids, disposed in accordance with 40 CFR 761.60(a).	Generation of PCB wastes from the cleanup of PCB remediation waste – relevant and appropriate	40 CFR § 761.61(a)(5)(v)(B) 40 CFR § 761.60(b)(1)(i)(B)
Decontamination/Cleanup of PCB Waste			
Decontamination of PCB contaminated water	For discharge to a treatment works as defined in 40 CFR § 503.9 (aa), or discharge to navigable waters, meet standard of < 3 ppb PCBs; or For unrestricted use, meet standard of ≤ 0.5 ppb PCBs.	Water containing PCBs regulated for disposal – applicable	40 CFR § 761.79(b)(1)(ii) 40 CFR § 761.79(b)(1)(iii)
Decontamination of movable equipment contaminated by PCBs (self-implementing option)	May decontaminate by: <ul style="list-style-type: none"> • swabbing surfaces that have contacted PCBs with a solvent; • a double wash/rinse as defined in 40 CFR 761.360-378; or • another applicable decontamination procedure under 40 CFR § 761.79. 	Movable equipment contaminated by PCBs and used in storage areas, tools and sampling equipment – relevant and appropriate	40 CFR § 761.79(c)(2)

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Action-Specific ARARs			
Action	Requirements	Prerequisite	Citation(s)
<i>Transportation of Wastes – Primary and Secondary</i>			
Transportation of PCB wastes off-site	Must comply with the manifesting provisions at 40 CFR § 761.207 through § 761.218.	Relinquishment of control over PCB wastes by transporting, or offering for transport – applicable	40 CFR § 761.207(a)
Transportation of hazardous materials	Shall be subject to and must comply with all applicable provisions of the HMTA and DOT HMR at 49 CFR §§ 171-180.	Any person who, , transports “in commerce,” or causes to be transported or shipped, a hazardous material, including each person performing pre-transportation functions under contract with any department, agency, or instrumentality of the executive, legislative, or judicial branch of the Federal government – applicable	49 CFR § 171.1(b) and (c)

ARAR = applicable or relevant and appropriate requirement
CFR = *Code of Federal Regulations*
DOT = U.S. Department of Transportation
EPA = U.S. Environmental Protection Agency
EPD = Georgia Environmental Protection Division of the Georgia Department of Natural Resources
GA Rule = *Rules and Regulations*, Section as noted
HMR = Hazardous Materials Regulations
HMTA = Hazardous Materials Transportation Act
NPDES = National Pollutant Discharge Elimination System
O.C.G.A. = *Official Code of Georgia Annotated*, Chapter as noted
PCB = polychlorinated biphenyl
PPE = personal protective equipment
RCRA = Resource Conservation and Recovery Act
TBC = to be considered
TSCA = Toxic Substances Control Act of 1976
U.S. = United States
> = greater than
< = less than
≥ = greater than or equal to
≤ = less than or equal to