




STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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TO: Huckleberry Palmer, Ecology TCP

FROM: Lori Rodriguez, Ecology HWTR 

AS PER: Lisa Brown, Ecology ERO HWTR Section Manager

DATE: November 4, 2014

RE: Applicability of WPCB listing to PCB contaminated soil from the City Parcel site, located at 708 N Cook in Spokane Washington

Matt Hooper, Engineering/Remediation Resources Group (ERRG) contacted Ecology's Hazardous Waste and Toxics Reduction Program (HWTR) on October 28, 2014 to discuss designation of PCB contaminated soil from remediation of the City Parcel site (Site). ERRG is contracted by Ecology's Toxic's Clean-up Program (TCP) to conduct remediation at the site. Since then, additional telephone communications have taken place between Randy Randall, ERRG, and/or Lori Rodriguez, HWTR, and Huckleberry Palmer, TCP City Parcel Site Manager.

Background

In the past, PCB contaminated soil (soil) from the site was disposed of according to the requirements of the Toxics Substance Control Act (TSCA). Wastes managed under TSCA requirements are exempt from the dangerous waste requirements for WPCB wastes per WAC 173-303-071(3)(k). A recent determination found TSCA is not applicable to the site soils with less than 50 ppm total PCBs. It is now necessary to determine whether this soil designates as a WPCB dangerous waste.

WPCB Designation

Designation for WPCB listed dangerous waste is based on whether the waste meets the listing description (listing). The listing includes:

- 1) Discarded transformers, capacitors and bushings containing PCBs at a concentration threshold of ≥ 2 ppm; and,
- 2) Cooling and insulating fluids, cores and core papers generated from salvaging, rebuilding or discarding transformers, capacitors or bushings.

Results of a potentially liable party (PLP) search in the TCP files indicate that the site was historically occupied by Spokane Transformer Company (STC), an organization engaged in the business of rebuilding and manufacturing transformers. Results of interviews with former employees indicated transformers were stored, unprotected, in the yard before being rebuilt.

They also reported the floor of the work area being covered with old oil from transformers with cracked casings and incidental spills during the rebuilding process.

Based on the information discussed above, **Ecology's HWTR believes the soil from City Parcel contains WPCB listed dangerous waste** as described in #2 above. Soil which contains listed dangerous waste is subject to the dangerous waste requirements.

Special Waste

Wastes which are a solid designate as dangerous waste **only** for Washington State Criteria (WSC2, WT02, WPCB, WP02), and are not extremely hazardous waste (EHW) or a federal hazardous waste are defined as Special Waste in WAC 173-303-040. If the contaminated soil from City Parcel designates only as a WPCB dangerous waste, it should meet this definition.

Special Waste has reduced management requirements which are described in WAC 173-303-073. This includes the option for disposal at a landfill permitted under WAC 173-351 (Municipal Solid Waste) and has an engineered liner used to meet the requirements of WAC 173-351-300(2)(b). Be advised, the Graham Road Landfill in Medical Lake does not meet these requirements.

Additional information on Special Waste requirements is attached.

LR/LB/cka