

**We are committed to promoting responsible stewardship while continually improving environmental performance through an effective and efficient Environmental Management System**

1. Purpose. The purpose of this Standard Operating Procedure (SOP) is to establish procedures and guidelines for the removal from service and turn-in for disposal Polychlorinated Biphenyls (PCBs) and items that could potentially contain PCBs.
2. Application. This guidance applies to all contractors and/or subcontractors providing services aboard Marine Corps installations on Okinawa including Japanese Facilities Improvement Program (JFIP) funded and controlled projects.
3. References.
  - (a) Japan Environmental Governing Standards (JEGS)
  - (b) 40 CFR 761
  - (c) EMSP 9.8 Contractor-Vendor Training Packet
  - (d) EMP 14.1.1 PCB Spill Response and Notification Procedures
  - (e) MOE Policy Letter No. 040217005 dtd 17 Feb 04
  - (f) MOE Press Release on Detection of Small Amount of PCB from Transformers and Other electrical Items dtd 26 Nov 03
  - (g) USFJ Policy on the Identification, Removal and Disposal of Fluorescent Light Fixtures and Parts Containing PCB within Fluorescent Light Fixtures dtd 24 Apr 01
  - (h) MCB Memorandum for purchasing PCB related electrical equipment dtd 19 Mar 04
  - (i) Emergency Response Guide ver 2012 guide number 171
4. Overview. Care should be taken when contractors handle, remove and turn-in items that may contain PCBs. Contractors may be required to remove, handle, label, manifest/transport, and turn-in such items as Transformers, Switches, Medium/High Voltage Cables, Paper Insulate Lead Cable (PILC), Potheads, Capacitors, Ballasts and Sealed Transformers. These items have the potential to contain PCBs. This SOP outlines procedures for contractor handling of each type of PCB containing article.
5. Procedure.
  - 5.1. Operational Controls:
    - a. Item Handling and Storage.
      - (1) Tarps, containments, absorbent berms, and spill kits should always be used to provide protection for the affected environment during operations.
      - (2) Contracting officers or representatives are required to provide supervision during removal operations, and Environmental personnel may be consulted to provide guidance when needed.
      - (3) Contractors will never perform sampling on Marine Corps property equipment. The Contracting Officer Representative (COR) will forward all sampling requests to the Environmental Support Team (EST) on Camp Foster to schedule sampling analysis. The EST will provide funding for analysis in support of the MCB Butler PCB program. Contractors do not incur sampling fees, unless a negligent spill or illegal disposal is determined by the Marine Corps or COR.

b. PCB Containing Materials.

(1) Transformers/Switches (free flowing liquid types). Most transformers contain free flowing dielectric oil. Some, classified as hermetically sealed, may contain dry dielectric potting material or semi-solid tar (see ballast/sealed transformer on Section 5.1.b (4).

(a) Oil filled transformers will be placed on metal drip pans with absorbent sheets placed between the transformer base and drip pan when not in service.

(b) Drip pans will be placed to ensure all four sides of the transformer, including all parts (e.g. insulators) are contained in the event of leaks.

(c) During storage, the transformer and drip pan will be strapped or banded together and placed indoors for protection from weather and the elements.

(d) During transport, the transformer and drip pan will be strapped or banded together, placed on a truck rated to support the load, and secured with straps to prevent movement.

(2) PILC Cable/Splices. PILC does not have free flowing liquid; however the paper insulation will leak at open ends, even at ambient temperature.

(a) Blue polyethylene tarps that are in good condition with a minimum of 10 mm thickness should always be placed around manholes and under spools of PILC during temporary storage and removal.

(b) Cables should be handled during removal to minimize cuts, and placed on a wooden spool. Camp Foster EST personnel office will provide heat-treated approved wooden spools for contracting crews prior to removal activities commence.

(c) Cable ends, or any area where sheathing is compromised, are to be wrapped and sealed with 3M® 130C or equivalent electrical tape to prevent leakage.

(d) Spools are to be marked to identify which manhole the PILC originated from. Place spools on a polyethylene tarp, and secure them inside an enclosed structure for protection from the elements.

(e) Arrange turn in schedule of items with the EST office prior to removal, to minimize temporary storage in the construction areas.

(f) Splices will be placed in United Nations Performance-Oriented Packaging (UN POP) certified open-top drums, and the drums marked to identify the manhole location where the splices originated.

(g) All debris items, such as tarps, rags, gloves, and absorbents, that come in contact with the cable during cable removal operations will be placed in UN POP certified open-top drums and marked with the contract number. Debris will be containerized daily to prevent cross contamination, as in the case of high winds.

(h) All tools used will be placed in UN POP certified drums daily for storage. Containerized tools will be delivered to the EST at the completion of the cable removal contract for decontamination, if

determined feasible. Tools will be decontaminated by the EST and reanalyzed for PCB surface contamination prior to returning to the contractor.

(3) Potheads (bell assemblies). Potheads contain a semi-solid tar that will leak when exposed to excessive ambient temperatures. These items will be placed in UN POP certified open-top drums and labeled as "POTHEAD". Drums will be stored in a secured location, away from the weather. These items will be segregated by manufacturer per drum, i.e. Japanese and American.

(4) Ballast and Sealed Transformers. These items contain semi-solid tars that are hermetically sealed within the casing.

(a) Ballasts will be segregated by manufacturer, i.e. Japanese and American. Personnel should use caution when removing and handling these items so as not to damage the manufacturer's label.

(b) Electrical wiring will be cut off at the casing and the ballasts then placed in a single layer on wooden pallets, segregated by country of origin.

(c) Ballasts in temporary storage will be placed in a secure location and protected against weather.

(d) Sealed transformers will be segregated by country of manufacture and placed in appropriate UN POP certified open-top drums, marked as "SEALED TRANSFORMER" with the corresponding contract number. Temporary storage will be in a secure location and protected against the weather.

c. Procurement:

(1) Contractors that require purchasing of items such as transformers, switches, circuit breakers, capacitors and light ballasts to complete a renovation or establish a new facility infrastructure are required to obtain a manufacturer's certification stating the item was made with "no PCB's".

(a) All items will have PCB concentrations under the current mandated level for Marine Corps installations on Okinawa, which is less than or equal to 0.5ppm. Articles will have a permanent label affixed by the manufacturer stating "PCB-Free" (no detectable PCBs).

(b) Manufacture statements that show "PCB FREE" or data plate statements with "less than 1 ppm at the time of manufacture" are NOT acceptable.

(c) Copies of the certificate, item serial number, and installed location will be forwarded to the Hazardous Waste/PCB Program Manager and to the Facilities Maintenance Officer, and kept on record for the duration of the item's service life.

d. Waste turn-in/Transportation.

(1) Contractors will call to pre-arrange a turn-in date and time for accumulated PCB-containing waste. In Okinawa, contractors will contact the EST and arrange for turn-in at Camp Foster, Building #5609.

(2) All PCB related items turned in will be documented with a waste disposal manifest. The form will accompany the waste from the time the waste leaves the point of origin, and will remain with the vehicle driver until reaching the final destination.

(3) Contractor vehicles transporting waste are required to have an emergency spill kit (see Section 5.3). Loads need to be secured to minimize movement in all four directions with appropriate weight-acceptable straps or chains.

(4) Vehicle drivers are required to have a means to communicate in case of an emergency, i.e. cell phone or radio transmitter.

5.2. Inspection: Spill kits should be inspected to verify that the kit is complete on a weekly basis, and an inventory checklist must be posted within the container.

### 5.3. Emergency Preparedness and Response Procedures:

#### a. On-site

(1) Emergency spill kits are required when construction projects begin operations on PCB related items. The quantity of spill supplies within the spill kits must be adequate to contain a release depending on the size of the equipment being moved.

(2) Spill kits must be within walking distance from the job site and placed in an open-top drum or roll out box for easy access. Spill kit items may include, but are not limited to, the following:

- Dry sweep
- Oil only absorbent pads or sheets
- Oil only absorbent socks
- All purpose absorbent or sheets (for use with oil/water mix)
- All purpose absorbent socks (for use with oil/water mix)
- Nitrile inner gloves
- Butyl outer gloves
- Tyvek inner suits
- Saranex splash guard suits
- Face shields

#### b. During Transport

(1) Spill kits are mandatory in vehicles transporting waste on-base and on local roads.

(2) In the event of a release, contractors are only authorized to stop, dike, and dam the spill. EST will perform clean-up. Caution should be used when applying absorbents to minimize oil contact with the environment, equipment, and personnel.

(3) Report the spill by calling 9-1-1 from on-base, and 098-911-1911 from off-base telephone or cell phone. The EST leader can be contacted by cell at 090-6861-7447.

(4) Contractors must note all items that come into contact with PCB related oils/tar and provide this and the data plate information to the on-scene emergency response personnel at arrival.

c. In case of a fire, the contractor will evacuate all personnel to a minimum of 800 meters (1/2 mile) in all directions.

5.4. Training: It will be the responsibility of the contractor's supervisor to provide PCB awareness training before operations begin. Training on this SOP is mandatory. MCB Butler Environmental can provide guidance if needed. Industrial Hygienist surveys should also be conducted prior to a construction site clearance.

5.5. Documentation and Record Keeping: Contractors must keep a copy of the manifests and training records. Hazardous Waste/PCB Program Manager and the Facilities Maintenance Officer must keep a copy of the certificate, item serial number, and installed location of PCB-related items provided by contractors.

6. If you have any questions or need additional information, please call your respective Camp/Station Environmental office.

EST Team	645-0987/0988
HW/PCB Program Manager	645-3139
Camp Foster/Lester	645-5970
MCAS Futenma	636-2066
Camp Kinser	637-4405
Camp Hansen/Courtney/CTA /Ie-Shima	623-4495
Camp Schwab/JWTC	625-2684