6240
NREAD
14 Nov 86

From: Environmental Control Specialist
To: Base Maintenance

Subj: LANTDIV COURTESY INSPECTIONS OF PCB - ITEMS ON 29 - 30 OCT 1986

Encl: (1) Report of PCB items inspected
(2) PCB Program Management Guide from NEESA

1. On 29 - 30 Oct 1986, I accompanied John Kresky, Environmental Engineer, LANTDIV; Leon McMillian and H. Ireland, Eletrical Distribution; and Manuel Martin, Natural Resources and Environmental Affairs Division on a courtesy inspection of randomly chosen PCB transformers currently in service aboard MCB, Camp Lejeune and MCAS(H), New River, and of the PCB - storage facility at Lot 140. The purpose of this inspection was to review the base's current management of PCB's, to identify areas of non-compliance, and to provide both information and recommendations for bringing the base into full compliance with 40CFR761.

2. Results of the inspection showed deficiencies in the areas of labeling, recordkeeping, and storage of PCB items.

(a) Labeling. Mr. Kresky pointed out that while the base's efforts to label or mark PCB transformers with its own stickers was commendable, it was, unfortunately, unacceptable to the EPA. 40CFR761.45 (see enclosure 2) contains all the information needed to mark PCB equipment and enclosures correctly.

(b) Recorkeeping. Mr. Kresky reviewed the PCB file folders kept by Electrical Distribution and stated that he knew that the Electric Shop knew where all its PCB items are located. But, he pointed out that EPA inspectors required immediate access to inventories and inspection records and the fate of PCB transformer carcases taken out of service. Mr. Kresky pointed out that the PCB Program

Management Guide (enclosure 2) has all the information for establishing and maintaining EPA - ready records.

(c) Storage. Each transformer must be marked with the date removed from service. If a transformer is leaky when carried to Lot 140 for storage, it must be placed in a drip pan and covered with a tarp or plastic to keep it dry. Proper PCB labels must be applied to transformers identified as PCB. The Lot 140 gate and the door of the storage shed must bear the same PCB label.

THOMAS BARBEE

Enclosure 1: Chart summarizing PCB items inspected on 29-30 Oct. 1986.

Bldg. No.	Does Transformer Have Ser. No.	Is it Inside or Outside?	Labeled Properly?	Leaking?	Other
H1	Yes	Outside	No	No	—
HP900	Yes	Inside	No	No	—
HP901	Yes	Inside	No	No	—
HP460	Yes	Inside	No	No	Floor drain is not blocked closed
FC 420	Yes	Outside	No	No	—
S25 (CL Sch)	Yes	Inside	No	No	Combustible trash (paper) on floor
AS 205	Yes	Outside	No	YES	—
AS [illegible]	Yes	Outside	No	No	—
AS 4020	Yes	Outside	No	No	—

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6240
NREAD
25 Jun 86

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

Subj: PCB TRANSFORMER AT LEJEUNE HIGH SCHOOL

1. On 20 June 1986, the subject transformer was discovered to have a small leak. An estimated 2-4 ounces of liquid coolant had seeped from the transformer. The seepage was attributed to heat buildup in the coolant. All of the liquids were adhered to the surface of the transformer and a cork pad it rested on.

2. The Base Fire Protection Division (BFPD) discovered the leak during routine followup on notifications by Base Maintenance Division (BMD) of the presence of the PCB transformers at the high school. Personnel from the Electric Shop, BMD, disconnected the power source, cleaned up the PCB and patched the seals. They also corrected a problem with incoming lines which was causing a minor electric arc. The electric arc was not believed to be related to the PCB problem. An absence of relatively destructive order raised some question as to whether the coolant contained PCB.

3. The problem was well handled by both BMD and BFPD. The spill was not large enough to require reports to regulatory agencies. BMD and NREAD personnel will be sampling transformers to determine actual PCB content. BMD is checking transformer to ensure patchwork was successful.

JULIAN I. WOOTEN

The Electrical Distribution Shop is responsible for:

1- Marking each transformer with indelible ink or paint with the month, day, and year it is removed from service.

2- Informing PCB Coordinator at NREAD of transformers in service which they believe to be PCB. A representative from the Electrical Distribution shop and the PCB Coordinator (or his representative) will then go together to apply the TSCA PCB label. Then The PCB Coordinator will enter the manufacturers nameplate information onto a new sheet in the PCB Inspection and Servicing Record so that the transformer can be managed as PCB and the tranformer will be given its first quarterly inspection.

3. Providing a representative to go with PCB coordinator or rep. on quarterly inspection of PCB XFMRS in Service.

4. Timely reporting any seepage, leakage, spillage, or fires involving PCB's and PCB items both in service and in storage to Base Fire Dept (3333) and to PCB Coordinator or rep. (xxxx)

5. Routine cleanup of seeps, leaks or spills of PCB's less than 10 pounds. This might include PCB's on XFMR cases, top changes, on concrete or asphalt. Cleanup must begin NLT 48hours after verbal notification of leak.

6. Safe transportation of transformers removed from service to Lot 140. Vehicle must be marked on all four sides if loaded with (1) more than 45 kg (99.4 lbs. or 8.2 gal) of liquid with PCB concentration 50ppm or more or (2) one or more PCB transformers.

6. (continued). "Known" PCB transformers are to be placed with the building at Lot 140. Too large PCB transformers may be stored on a pallet outside on the concrete pad with those XFMRS presumed to be non-PCB.

7. Taking precautions to prevent PCB's from getting into the environment at LOT 140. outside bldg (temp storage) This means placing leaking XFMRS into drip pans and covering with a plastic cover secured around all edges of drip pan. Inside bldg (permanent storage) leaking XFMRS (KNOWN PCB) should be placed in drip pans. These leaks must be controlled before DRMO will accept the items. (Note 1)

8. Notifying PCB Coordinator or E.C. & M Section when there are 10 - 15 transformers and/or barrels to be sampled at LOT 140. Electrical Distribution Shop will provide manpower to open transformers and/or barrels at time of sampling.

9. Upon receipt of results of sampling, move identified PCB XFMRS/barrels into bldg. at LOT 140. Move non-PCB XFMRS to LOT 203.

Note 1
Re. 7, Maintaining Building "impermeable floor" "leaking Roofs"

From: ME

To: DIRECTOR, NREAD

SUBJ: FIRE AT CAPACITOR LOT

1. ON 27 OCTOBER 1986, THERE WAS A FIRE AT THE MAIN ~~TRA~~ SWITCHING STATION OFF HOLCOMB BLVD. INVOLVING SEVERAL CAPACITORS IN THE CAPACITOR LOT ON THE CP&L SIDE OF THE STATION. THE CAPACITOR LOT IS LABELLED WITH A PCB SIGN. THE FIRE OCCURRED AROUND 10:00 AM. THE UTILITIES DIRECTOR CALLED NREAD AROUND 14:30 FOR ENVIRONMENTAL TO COME OUT TO THE LOT.

2. ~~We~~ Tom BARBEE AND I VISITED THE LOT AT APPROXIMATELY 1500. A REVIEW OF ~~THE~~ AREA OF THE FIRE SHOWED SEVERAL CAPACITORS MISSING AND SEVERAL CHARRED. THE IMMEDIATE ARE UNDER AND AROUND THE CAPACITORS SHOWED SOME MISSING OIL. THE RAILROAD TIE ~~WE~~ THAT THE CAPACITOR RACK IS MOUNTED ~~WAS~~ SHOWED SOME OIL. OVERALL THERE DIDN'T APPEAR TO BE MUCH OIL RELEASED, I WOULD ESTIMATE THAT NOT ~~TOO~~ MORE THAN 1 GALLON WAS RELEASED.

DDS
LAB COPY

T-6241/3

CAROLINA POWER & LIGHT CO.
P.O. BOX 9
JACKSONVILLE, N.C. 28540

FIRE PROTECTION DIVISION
MCAB CAMP LEJUNE BLDG. 18
CAMP LEJUNE, N.C.
ATTN BASE FIRE CHIEF

DEAR SIR:

I AM SENDING YOU THIS INFORMATION ON THE QUANTITY OF PCB FLUIDS AT OUR CAMP LEJUNE 230/12 KV SUBSTATION AND CAMP GEIGER 115/12 KV SUBSTATION AT THE REQUEST OF MR. RAY FRENCH OF 10-28-86.

CAMP LEJUNE 230/12 KV SUBSTATION - APPROXIMATELY 950 GALLONS OF FLUID DISTRIBUTED AMONG 269 INDIVIDUAL CAPACITORS

AVERAGE OF:
3.5 gal. each capacitor →
3.5 gal $\left(\frac{5\text{kg}}{\text{gal}}\right)$ = 17.5 kg.
17.5 kg = 38.5 lb.

CAMP GEIGER 115/12 KV SUBSTATION - APPROXIMATELY 460 GALLONS OF FLUID DISTRIBUTED AMONG 132 INDIVIDUAL CAPACITORS.

IF YOU HAVE ANY QUESTIONS OR NEED FURTHER ASSISTANCE CALL ME AT 347-4301.

THANK YOU,
DAVID D. CLAYTON
SUBSTATION MAINTENANCE FOREMAN, JACKSONVILLE.

Electrical Distribution Shop:

Desk Top Procedures for Handling PCB Items

The Electrical Distribution Shop is responsible for:

1- Marking each transformer (regardless of PCB content) with indelible ink or paint with the month, day, and year it is removed from service.

2- Informing the PCB coordinator at NREAD of transformers in service which they believe to be PCB. A representative from the Electrical Distribution Shop and the PCB coordinator (or representative) will then go together to apply the TSCA PCB label. Then the PCB coordinator will enter the manufacturer's nameplate information onto a new sheet in the PCB Inspection and Servicing Record so that the transformer can be managed as PCB. The transformer will be given its first quarterly inspection.

3- Providing a representative to go with PCB coordinator or rep. on quarterly inspections of PCB transformers in service.

4- Timely reporting any seepage, leakage, spillage, or fires involving PCB's and PCB items both in service and in storage to Base Fire Dept. (3333) And to PCB coordinator or representative (5003).

5 – Routine cleanup of seeps, leaks, or spills of PCB's. ~~less than 10 pounds~~. This will include PCB's on transformer cases, tap changer, or any part or ~~sup~~ surface of the Transformer. The Electrical Distribution Shop must call Base Fire Dept. if PCB's are determined to have leaked onto the floor, concrete pad, asphalt surface, or the ground. This cleanup will be accomplished by:

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6 – Safe transportation of transformers removed from service to Lot 140. The vehicle used must be marked on all four sides if loaded with: (1) more than 45 kg (99.4 lbs. or 8.2 gal.) of liquid with PCB concentration 50 ppm or more or (2) one or more PCB transformers. ~~Each~~ Vehicle must carry a spill kit large enough to contain a potential spill from the PCB item(s).

7 — Placing known PCB transformers into the building at Lot 140. Transformers with unknown PCB concentrations can be stored on the concrete pad at Lot 140. Known PCB transformers too large for the building may be stored on a pallet on the concrete pad.

8 — Taking precautions to prevent PCBs from getting into the environment in both permanent and temporary storage areas. For temporary storage, or outside on the pad, this means placing any leaking transformers in drip pans and covering with a plastic cover secured around all edges of the drip pan. For permanent storage, or inside the building, leaking transformers should be placed in drip pans.

9 — All leaks from any transformers or containers must be controlled before DRMO will accept the items.

10. Notifying PCB coordinator or Environmental Chemistry and Microbiology Section (5977) when there are 10-15 transformers and/or barrels to be sampled at Lot 140. Electrical Distribution Shop will provide manpower to open and close transformers and/or barrels at time of sampling.

11 — upon receipt of results of sampling, move identified PCB transformers and/or barrels into permanent storage bldg. Non PCB items are to be moved by Elec Shop to Lot 203.