



FALL RIVER RURAL ELECTRIC COOPERATIVE, INC.

GENERAL POLICY No. 419
SUBJECT: POLYCHLORINATED BIPHENYLS (PCB)

I. PURPOSE:

- A. To establish, clarify, and explain to all employees the process pursuant to regulations of the United States Environmental Protection Agency (EPA) for storage, handling, and elimination of PCB's on the Cooperative's system.
- B. To comply, in good faith, with all Federal, State, and local PCB regulations.
- C. To enhance the safety of the employees, contractors, general public, and anyone else who might be exposed to PCB. Also, to establish procedures to promptly correct any violations of Federal, State, and Local Regulations.
- D. To maintain adequate records of placement, handling, storage, and disposal of PCB.
- E. To minimize the environmental contamination by PCB from the Cooperative's system, and to establish procedures to assist EPA and other governmental agencies to minimize any harm to the environment caused by PCB.

II. POLICY:

It shall be the policy of the Cooperative to require all employees to comply with all Environmental Protection Agency (EPA), State, and Local regulations, furthermore to promote proper work procedures and habits to protect all people and environmental properties from PCB. Any violations of PCB regulations are to be corrected promptly and thoroughly.

III. RESPONSIBILITY:

The Board of Directors, CEO/General Manager, Designated Staff Members, and all employees of the Cooperative, are to use all good faith efforts to comply with

PCB regulations.

IV. PROVISIONS:

The CEO/General Manager shall be responsible for providing opportunities for proper education, procedures, equipment, and facilities to insure the success of this policy.

A. The Designated Staff must:

1. Be knowledgeable of current Federal and State Regulations, and implement a program that will ensure that the Cooperative is in compliance with these regulations. A full set of these regulations is available at the office of the Cooperative.
2. Take part in an ongoing education process to keep current of new laws and changing interpretations.
3. All employees involved in the handling, storage, transporting and testing of PCB shall avail themselves of such education and training as required by the nature of their respective jobs and respond in such a manner as to insure compliance with the purpose of this policy.
4. Coordinate and oversee the following programs and procedures.

V. PROGRAM PROCEDURES:

A. LINE CREW EDUCATION AND TRAINING:

1. The Line Crew's cooperation is necessary to the overall success of the compliance effort. The people on the line crew must be knowledgeable of the EPA Regulations. They will be trained in the proper handling and transporting procedures of PCB.
2. The line crew personnel should promote good customer relations by helping to educate and inform the general public concerning PCBs.

B. SERVICING PROCEDURES:

In the servicing of all devices that use oil as a dielectric, and coolant, all

employees shall comply with the PCB regulations. Therefore, the Cooperative will stock only NON-PCB oil and strive to rid the system of PCB as soon as it is feasible.

C. WAREHOUSE AND STORAGE YARD:

1. All leaking transformers will be serviced, and any leaks stopped. Any oil found on the outside of the transformer will be wiped off as soon as possible to prevent the oil from dripping onto the ground. Procedures for handling spills and leaks are set forth in 40 CFR 761.60 of EPA Regulations.
2. Stock transformers, regulators, and OCR's shall be stored in a separate area from the burned out or junk devices, as provided for in 40 CFR 761.65.
3. Ground contamination, should it occur, will be cleaned up immediately and disposed of as per EPA regulations 40 CFR 761.60. All spills shall be reported immediately to the Operation Manager.
4. If transformer oil needs to be stored outside it shall not be stored in containers which hold over Fifty-five (55) gallons.

D. MARKING / LABELING / IDENTIFYING:

1. In service equipment and containers which contain PCB shall be marked with an EPA approved label, as shall all out of service equipment and containers which contain PCB.
2. Storage areas shall be adequately marked so as to help employees identify proper storage areas.
3. Vehicles used to transport PCB containing devices shall be marked and signed per EPA regulations. State permit regulations, if applicable, shall be complied with.

E. INSPECTIONS:

PCB transformers, storage areas, and other PCB items shall be inspected and maintained as specified in EPA regulations.

F. FIRE RULE REGISTRATION AND USE REQUIREMENTS:

Information about the locations of devices containing PCB will be supplied to the local fire departments on the Cooperative's system.

G. ONGOING PCB TESTING PROGRAM:

Screening tests will only be used for in house information and will never be used as a final determination in lieu of official laboratory tests.

H. LEAKS AND SPILLS:

1. Spills and leaks will be handled according to the EPA regulations 40 CFR 761.60. In all instances electrical safety procedures will be observed first.
2. When handling any PCB article or PCB fluids the personal protective equipment should include but not be limited to:
 - a. Disposable Rubber Gloves.
 - b. Boot Covers.
 - c. Bib-Type Aprons or Full Protective Suits.
 - d. Chemical Safety Goggles or Face Shields.

NOTE: The type of protective equipment to be used will depend upon the individual circumstances and may include the use of respirators and other personal protective devices. The person in charge of the task at hand will make this determination.

3. If contact is made with PCB's, it shall become the responsibility of the individual to take the following actions:
 - a. If liquid PCB or PCB contaminated solvents come into contact with the eyes, irrigate immediately with water for at least 15 minutes. Consult a Doctor as soon as possible following the eye irrigation.
 - b. On contact with the skin, wash the area with waterless soap, followed by an additional washing of soap and water.
 - c. Avoid ingestion. Do not eat, drink or smoke in an area where PCB is present. Wash hands and exposed skin areas

thoroughly before eating, drinking, smoking or using restroom facilities.

- d. Any protective clothing that becomes contaminated shall be discarded with the contaminated wastes. Contaminated personal clothing will be removed and disposed of with other contaminated wastes.
- e. Avoid breathing PCB vapors. Confined spaces should be force ventilated and respiratory protection worn when needed. Generally, PCB vapors are not a problem in open spaces unless large quantities or elevated temperatures are involved.

I. REBUILDERS:

If rebuilders are used, a contract with the rebuilders will be used to insure PCB FREE fluids are used to service the devices purchased or rebuilt.

J. PCB STORAGE:

- 1. The Cooperative will build and maintain a storage facility that meets EPA regulations 40 CFR 761.60.
- 2. A container log will be kept and updated whenever the storage facility is used.
- 3. All devices that are placed in the facility will be properly signed and tagged with information pertaining to that particular device.

K. RECORD KEEPING SYSTEM:

Records will be kept on all aspects of the Cooperative's activities concerning PCB. These records will include records on Test Results, PCB Inventory, Contractor Identification, Disposal Records, Annual Documents, Food and Feed Survey, Fire Rule Registrations, PCB Transformer Regulator and OCR Inspections, Spill Reports, Retro fills, Reclassifications, Equipment Sold for Reuse, and any other activity which involves PCB. The Cooperative shall fully comply with the records and reporting requirements as set forth in EPA regulations 40 CFR 761.180.

L. PURCHASING:

It shall be the policy of the Cooperative to purchase only PCB Free equipment and to purchase only PCB Free dielectric fluid for repair or servicing equipment.

M. DISPOSAL:

Disposal means intentionally or accidentally to discard, throw away, or otherwise complete or terminate the useful life of PCBs and PCB items. Disposal includes spills, leaks, and other uncontrolled discharged of PCBs as well as actions related to containing, transporting, destroying, degrading, decontaminating, or confining PCBs and PCB items. All PCBs in concentrations greater than 50 PPM, and all PCB items must be disposed of in accordance with the EPA disposal regulations 40 CFR 761.60 and 761.65.

N. EPA INSPECTIONS:

1. EPA inspections are conducted pursuant to specific statutory authorizations. It is advisable to assure that the scope of any inspection remains within the intended scope of the inspection, and within the bounds of the inspectors' authority.
2. The person or persons who work with the EPA inspector and supervise the inspection will be the Manager of Engineering and/or the Manager of Operations.
3. The inspection process will consist of three specific stages: 1. The Pre-Investigation conference. 2. The Actual Inspection. 3. The Post-Inspection conference. A general outline of procedures to follow during the three states are:
 - a. Once the designated personnel are available to meet the inspector, a pre-inspection conference must occur. During this conference, the following steps need to be followed:
 - (1) Check inspectors' identification.
 - (2) Insist on opening conference to establish:
 - (3) The legal authority for the inspection.
 - (4) The purpose and scope for the inspection – is there a complaint involved?

- (5) What areas and operation it will cover, if there is a complaint, limit inspection to areas of complaint.
- (6) Whether documents or photographs will be taken.
- b. If the "opening conference" is refused or if the inspector cannot cite any legal authority for the inspection, you should refuse entry. If entry is refused it should be done with a great deal of discretion.
- c. Inform inspector of safety rules. The inspector must follow safety rules.
- d. Instruct the inspector to address questions to the inspection supervisor only.
- e. Notify appropriate counsel. Even if it seems routine, you may be part of a larger inspection pattern.

O. THE INSPECTION:

- 1. Provide transport.
- 2. Limit the area to that agreed upon in the opening conference.
- 3. Limit the subject investigated in accordance with statutory limits on the inspectors' authority.
- 4. Do not enter areas of emergency.
- 5. Do not answer questions unless you know the answer, you can always get answers later.
- 6. Keep detailed notes.
- 7. Obtain blanks of forms used by the inspector.
- 8. Obtain split samples. Take samples for the inspector and yourself if at all possible. Send the samples to a qualified lab. Do not test any samples unless the government tests are unfavorable. Never disclose any samples or monitoring results, aside from those required by law, without the Cooperative Attorney's approval.

9. Mark any documents inspected or copied, and whether the inspector has a right to those records.
10. Obtain prints of any photographs taken. In certain areas there may be legitimate reasons to prohibit photographs. Take duplicate photographs.

P. POST INSPECTION PROCEDURES:

1. Insist upon a closing conference.
 - a. Keep notes.
 - b. Ask inspector to identify problems.
 - c. Verify any questionable observations.
2. Request a copy of the inspector's report. Some states require that a list of any violations found be given to the facility.

Q. PROTECTION OF BUSINESS RECORDS:

Some laws and regulations require maintenance of specific records that may be inspected at any time. Procedures for maintenance and protection of business records must be in place before the inspector shows up.

R. Primacy of Policy

This policy supersedes any existing policy that may be in conflict with the provisions of this policy.

APPROVED BY THE BOARD OF DIRECTORS



Doug Schmier, President

DATE APPROVED: March 24, 2003

DATE REVISED: September 28, 2015

June 17, 2019