

Regulatory Compliance Services, Inc.

PCB MANAGEMENT, COMPLIANCE & LIABILITY ASSESSMENT

**The Complete & Comprehensive Training Course
For Electric Utilities**

DAY 1

8:30 A.M. - 4:30 P.M.



DAY 2

8:30 A.M. - 4:30 P.M.

All attendees will receive the new RCS Workshop Reference Manual containing:

- A Large-Print Version of the PCB Regulations - "40 CFR Part 761"
- The June 29, 1998 Federal Register - The "PCB Mega Rule"
- The April 2, 2001 Federal Register - The "Reclassification Amendments"
- A Complete Set of New & Simplified RCS "PCB Record-keeping Forms"
- Numerous Other "Reference & Guidance" Handout Materials

Seattle, Washington

Tuesday - Wednesday, August 4 - 5, 2009

Note: Contact RCS for workshop location and hotel information

RCS, Inc. "The PCB Management Specialists"

Serving the electric utility industry since 1985

Phone: 417-886-4580 Email: rcsinc@aol.com

“PCB Management, Compliance & Liability Assessment” Workshop

Hosted by:
U.S. E.P.A. Region 10 and Regulatory Compliance Services, Inc.

Seattle, Washington

Tuesday - Wednesday, August 4 - 5, 2009

Note: Contact RCS for workshop location and hotel information

REGISTRATION FORM

Company _____ Phone _____

Address _____ City, State, Zip _____

Attendee Names:

1. Mr. Ms. _____ Title: _____

Email Address: _____

2. Mr. Ms. _____ Title: _____

Email Address: _____

3. Mr. Ms. _____ Title: _____

Email Address: _____

4. Mr. Ms. _____ Title: _____

Email Address: _____

Registration Fee: \$175 for 1st Registrant / \$100 for each additional Registrant
Registration fee includes workshop reference manual and all handout materials.

3 Easy Ways To Register

1. **MAIL** your registration form to:

Regulatory Compliance Services
P.O. Box 4642, Springfield, MO 65808

2. **FAX** your registration form to:

Regulatory Compliance Services
(417) 883-2622

3. **Email** your

registration form to:
rcsinc@aol.com

Form of Payment: Check enclosed Please bill (P.O. # _____)

Credit Card (Name on Card _____)

Visa MasterCard (Card # _____ Exp. Date _____)

Questions: Contact Mark Pennell @ (417) 886-4580 or E-Mail to "rcsinc@aol.com"

Course Description . . .

“PCB Management, Compliance & Liability Assessment”

--- August 4-5, 2009 ---

Seattle, Washington

The 2009 E.P.A. Region 10 “PCB Management, Compliance & Liability Assessment” workshop will include comprehensive coverage of most major aspects of the Agency’s PCB regulations under 40 CFR Part 761.

This two-day course has been designed to meet the needs of those new to the regulations (i.e., reviewing the basics), as well as those well-versed in their understanding of EPA’s regulatory requirements and interpretations (i.e., advanced PCB issues).

In addition to our examination of numerous regulatory standards, we will be discussing many collateral topics such as liability assessment and enforcement priorities.

This class is being co-hosted by Regulatory Compliance Services, Inc.

RCS has provided PCB management assistance for the regulated community for over 20 years and currently represents more than 400 rural, municipal and investor-owned electric utilities. RCS President, Mark Pennell, will be presiding as course instructor.

In 2009, RCS is hosting this workshop in six other locations around the country with a registration fee of \$895 per person. However, with thanks to the EPA’s Region 10 subsidizing of this class, those attending in Seattle are being afforded a substantial registration discount. As you will notice on the “Registration Form”, the fee has been reduced to \$175 for the first person in attendance and \$100 per person for all additional delegates from the same company.

All workshop attendees will receive a workshop reference manual which includes a copy of 40 CFR Part 761; copies of the 1998 and 2001 Federal Registers on the EPA’s “disposal amendments” and “retrofill/reclassification” amendments; a set of PCB spill cleanup guidance documents; a set of PCB recordkeeping forms; and, all workshop handouts and reference materials.

2009 PCB Management, Compliance and Liability Workshop

-- AGENDA --

(Page One)

DAY ONE - Tuesday, August 4th:

- | | |
|---------------|---|
| 8:30 – 9:30 | <u>PCB Management - Foundational Issues</u> <ul style="list-style-type: none">- Brief history of the PCB regulations- Why did the EPA “ban” PCBs?- After 30 years of managing PCBs, where do we stand?- Is EPA considering removing “Use Authorizations” from the regs.? |
| 9:30 – 9:45 | Break |
| 9:45 – 10:45 | <u>PCB Management - Foundational Issues (continued)</u> <ul style="list-style-type: none">- How the regulations are structured: Use vs. Disposal- Understanding the language of the regulations: 761.3 Definitions- PCB marking/labeling requirements- Testing for PCBs: compliance vs. risk management |
| 10:45 – 11:00 | Break |
| 11:00 – Noon | <u>Managing PCBs in “Askarel-filled” Electrical Equipment</u> <ul style="list-style-type: none">- PCB transformers- PCB capacitors (large and small)- PCB other equipment |
| Noon | Lunch |
| 1:00 – 2:00 | <u>Managing PCBs in “Non-Liquid” Items</u> <ul style="list-style-type: none">- PCBs in electromechanical relays, wave traps, potential devices, etc.- PCBs in bushings, pot-heads, PTs/CTs, ballasts, etc.- PCBs in paints, calks, coatings, cable, etc. |
| 2:00 – 2:15 | Break |
| 2:15 – 3:15 | <u>Managing PCBs in “Mineral Oil-filled” Electrical Equipment</u> <ul style="list-style-type: none">- Transformers and voltage regulators- Breakers, reclosers and cable- Other oil-filled electrical equipment |
| 3:15 – 3:30 | Break |
| 3:30 – 4:30 | <u>PCB Storage for Reuse vs. Storage for Disposal</u> <ul style="list-style-type: none">- Storage for reuse options and record-keeping requirements- Storage for disposal options and inspection requirements- Storage for “evaluation” ... is there a provision? |
| 4:30 | Adjourn |

2009 PCB Management, Compliance and Liability Workshop

-- AGENDA --

(Page Two)

DAY TWO - Wednesday, August 5th:

- | | |
|---------------|---|
| 8:30 – 9:30 | <u>PCB Spills – Reporting, Cleanup, Testing and Record-keeping</u> <ul style="list-style-type: none">- PCB Spill Cleanup using the EPA’s “National Spill Cleanup Policy”- Reporting requirements for “fresh” spills- PCB spill clean-up and record-keeping requirements |
| 9:30 – 9:45 | Break |
| 9:45 – 10:45 | <u>PCB Spills – “Remediation Waste” Cleanup Options</u> <ul style="list-style-type: none">- Pre-cleanup sampling requirements and options- Considerations for remediation clean-up under 761.61 (a), (b) and (c)- Historic PCB clean-ups vs. post-TSCA clean-ups under 761.61 |
| 10:45 – 11:00 | Break |
| 11:00 – Noon | <u>“Double-encapsulation” Options and Requirements under 761.30(p)</u> <ul style="list-style-type: none">- Utilizing “double-encapsulation” as a viable “use authorization”- Various “double-encapsulation” scenarios- Does 761.30(p) provide amnesty from “improper disposal”? |
| Noon | Lunch |
| 1:00 – 2:00 | <u>Managing “Non-PCB” Electrical Equipment and Used Oil</u> <ul style="list-style-type: none">- Examining “sale for reuse” &/or “scrapping” of Non-PCB Items- Considerations when managing/disposing of “Non-PCB” waste oils- What is the relationship between “Non-PCB” items and CERCLA? |
| 2:00 – 2:15 | Break |
| 2:15 – 3:15 | <u>Compiling Compliant and Interpretable PCB Records</u> <ul style="list-style-type: none">- PCB testing logs and laboratory reports- Drum records and bulk storage tank logs- Maintaining PCB inspection records |
| 3:15 – 3:30 | Break |
| 3:30 – 4:30 | <u>Compiling Compliant and Interpretable PCB Records (continued)</u> <ul style="list-style-type: none">- PCB disposal shipments (preparing shipping lists and the UHWM)- “Retrofill/reclassification” record-keeping requirements- Compiling proper “PCB Annual Document Logs and Summaries” |
| 4:30 | Adjourn |