



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

***CERTIFIED MAIL
RETURN RECEIPT REQUESTED***

OCT 28 2013

ENPRO Services of Vermont, Inc.
c/o David A. Cowie, Chief Operating Officer
ENPRO Services, Inc.
12 Mulliken Way
Newburyport, Massachusetts 01950

Re: Commercial Storage of PCBs
ENPRO Services of Vermont, Inc.
EPA ID. No VTR000517052

Dear Mr. Cowie:

The United States Environmental Protection Agency-New England (EPA) has determined that ENPRO Services of Vermont, Inc. ("ENPRO") located at 54 Avenue D in Williston, Vermont ("the Facility") meets the requirements of 40 CFR § 761.65(d)(6) to qualify for an exemption from the requirement to obtain approval as a commercial storer of PCB waste under the Toxic Substances Control Act ("TSCA"), Section 6(e), 15 USC § 2605(e), and 40 CFR § 761.65(d).

This determination is based on the following findings:

1. The Facility is permitted by the State of Vermont under the state's RCRA program to operate as a hazardous waste storage facility. The State of Vermont Department of Environmental Conservation (VTDEC) renewed the permit on September 29, 2010 ("RCRA permit");
2. The Closure Plan dated September 2010 ("Closure Plan") is substantially equivalent to the closure plan requirements under 40 CFR §§ 761.65(d) through (g);
3. The closure cost estimate and financial assurance demonstration account for maximum PCB inventories;
4. ENPRO has submitted relevant information bearing upon its qualifications to engage in the business of commercial storage of PCBs, as detailed in 40 CFR § 761.65(d)(3); and,

5. ENPRO has certified compliance with 40 CFR § 761.65(b) and/or (c)(7), as required by 40 CFR § 761.65(d)(3).

Based upon these findings, EPA hereby exempts ENPRO from separate TSCA approval for the commercial storage of PCB waste, in accordance with 40 CFR § 761.65(d)(6) subject to the following conditions:

1. The RCRA permit upon which this exemption has been based must be in effect at all times. Upon expiration or revocation of the RCRA permit, this exemption will no longer be in effect. Any further PCB waste storage activity would then require separate TSCA approval.
2. This exemption applies to the storage areas identified as "D-2", "D-5", "Loading Dock", two Outdoor Secondary Containment Structures, and "Storage Cell A-1" on Figure D-1 of the Closure Plan.
3. The total inventory of PCB wastes stored at the facility shall not exceed one hundred 55-gallon drums or the volumetric equivalent thereof.
4. ENPRO must comply with all applicable federal, state and local regulations, including EPA's PCB Spill Cleanup Policy under 40 CFR Part 761, Subpart G (which applies to spills less than 72 hours old), during the cleanup, storage, handling, and disposal of all PCB waste.
5. Required submittals shall be mailed to:

Kimberly N. Tisa, PCB Coordinator
United States Environmental Protection Agency
5 Post Office Square, Suite 100 – OSRR07-2
Boston, Massachusetts 02109-3912
Telephone: (617) 918-1527
Facsimile: (617) 918-0527

6. This exemption is granted to ENPRO and is not transferable without prior written authorization from the EPA Regional Administrator or his designee. Furthermore, ENPRO shall notify EPA in writing prior to any departure from, changes, or modifications to the RCRA certification, warehousing design, closure plan, or financial assurance. Based on EPA's review of this information, EPA may require ENPRO to obtain a separate approval under TSCA as a commercial storer of PCB waste in the event that EPA determines that ENPRO no longer meets the exemption qualifications.

7. Any departure from the conditions of this exemption without prior, written authorization from EPA may result in the initiation of revocation, suspension or termination proceedings, as well as enforcement under TSCA.
8. Upon notice of revocation of this exemption, ENPRO shall have 30 days to initiate closure in accordance with the Closure Plan approved under the RCRA permit. No additional PCB wastes may be accepted by ENPRO after EPA's notice of revocation of this exemption.

Should you have any questions regarding this matter, please contact Kimberly Tisa of my staff at (617) 918-1527.

Sincerely,



James T. Owens, III
Director, Office of Site Remediation & Restoration

cc: S. Simoes, VTDEC
File