

U.S. Department
of Transportation
United States
Coast Guard



Commanding Officer
USCG Loran Station
Kargaburun, TU
APO New York, NY

.09379-5000

16478

29 APR 1990

From: Commanding Officer, USCG Loran Station Kargaburun TU
To: Commander (ECV), USCG Activities Europe

Subj: PCB SPILL PREVENTION CONTROL AND COUNTERMEASURES
PLAN; PREPARATION OF

Ref: (a) COMDTINST M16478.2 The Procurement, Handling and
Disposal of Polychlorinated Biphenyls (PCBs)

1. A PCB Spill Prevention Control and Countermeasures Plan has been prepared in accordance with reference (a), and is submitted as Enclosure (1).
2. I intend to update this plan as necessary upon receipt of test information on samples previously submitted.

A handwritten signature in black ink, appearing to read "C. C. FAHY".

C. C. FAHY, LTjg, USCG

Encl: (1) USCG LORSTA Kargaburun PCB Spill Prevention
Control and Countermeasures Plan



16478
29 APR 1990

From: Senior Technical Officer, USCG LORAN
Station Kargaburun TU
To: Commanding Officer, USCG LORAN Station
Kargaburun TU
Subj: PCB SPILL PREVENTION CONTROL AND COUNTERMEASURES
PLAN; SUBMISSION OF
Ref: (a) COMDTINST M16478.2 The Procurement, Handling and
Disposal of Polychlorinated Biphenyls (PCBs)

1. In accordance with reference (a), a PCB Spill Prevention Control and Countermeasures Plan is submitted as Enclosure (1) for your review. Enclosures 2 through 4 are purchase requests for items required for reference (a) that are not on board. One additional cost item will be the repair of one Scott Air-Pak to replace the one appropriated for use as required by reference (a).

2. I have been informed by CWO Brazille, Activities Europe Inspector, that there are some test samples submitted (before I arrived) from certain transformers on board. Activities Europe will forward these test results when they arrive.

3. LCDR Shaw, Activities Europe, will forward a new Commandant Instruction relating to PCBs.

4. I will update our plan upon receipt of new information from Activities Europe.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "A. A. Alpers".

A. A. Alpers, CW02, USCG

Encl: (1) USCG LORSTA Kargaburun PCB Spill Prevention
Control and Countermeasures Plan
(2) Purchase request for Direct Safety Co.
(3) Purchase request for Labelmaster
(4) Surf Requisition Log

U.S. Department
of Transportation

United States
Coast Guard



PCB SPILL PREVENTION CONTROL
AND
COUNTERMEASURE PLAN
FOR
USCG LORAN STATION KARGABURUN, TU

Commanding Officer
USCG LORAN Station
Kargaburun, TU
APO New York, NY

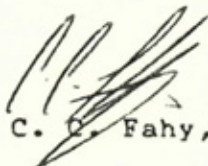
09379-5000

24 April 1990

LETTER OF PROMULGATION

Ref (a) CONDTINST M16478.2

1. This PCB Spill Prevention Control And Countermeasure Plan shall be maintained in accordance with reference (a). It shall be physically maintained in the Electronics Office.
2. Personnel that handle PCB's and/or PCB items in the line of duty are required to familiarize themselves with and comply with reference (a). All personnel shall indicate they have read and understand reference (a) by dating and signing enclosure (1)


C. D. Fahy, LTJG, USCG

Encl: (1) Date and Signature Form

[illegible]

PCB SPCC PLANS

District Office and Location:USCG Activities Europe (ECV)

Date of Preparation: 24 April 1990

~~This PCB SPCC Plan will be implemented as herein described.~~

Signature:

Name: CHRISTIAN C FAHY

Title: Commanding Officer

I hereby certify that I have examined the LORAN Station Kargaburun PCB SPCC Plan, and being familiar with the provisions of 40 CFR, Parts 112.7 and 151.7 attest that this PCB ECC Plan has been prepared in accordance with good engineering practices. (Section 112.3 (d) and 151.3 (d)).

Printed name of registered
professional Engineer.

Signature of Registered
Professional Engineer

(Seal)

Date signed: _____

Registration nr	St
-----------------	----

C. Conformance

Describe present LORAN Station Kargaburun conformance with SPCC Regulations governing PCBs.

D. Plan Location

This plan must be located in the Field Office nearest the largest Utility storage area and indicate the LORAN Station Kargaburun representative responsible for PCB Operations:

Responsible person: Senior Technical Officer

Plan location: Electronics Shop

E. Records & Inspections

1. Describe all PCB related records kept and their location. This must include inspection records as well as records of PCB transfers.

PCBs and PCB items in service, or projected for disposal inventory; storage transfers; storage inventories. These records include weights, location, dates, total numbers and all other required information as dictated by the final PCB Use Ban Regulation 40 CFR 761.45 (Annex VI)

2. Regular inspections of PCB storage areas, containers, and their respective spill prevention apparatus will be conducted as follows:

Monthly inspection with Senior Technical Officer and one other witness present. PCBs and PCB items in service or projected for disposal; storage inventories. These records include weights, locations, dates, total numbers and all other related required information as dictated by the Final PCB Use Ban Regulation 40 CFR 761.45 (Annex VI)

All in use PCB equipment is inspected bi-weekly by maintenance personnel.

F. Storage

1. Describe storage facilities presently in use. Indicate facilities for (a) storage for disposal, and (b) storage for PCBs prior to use.

The facility for storage and disposal is the transmitter building with impervious floors of cement, devoid of expansion joints, drains, valves, ect, with a 6 inch foundation rise around the floor. The transmitter building is locked at all times when maintenance personnel are not present.

2. Describe the design of containment or diversionary devices presently in use for largest PCB storage areas:

6 inch foundation around a impervious cement floor.

F. STORAGE

DESCRIBE ANY IMPROVEMENTS PLANNED FOR THESE FACILITIES, THEIR CONTAINMENTS PROVISIONS, INSPECTION PROCEDURES OR OTHER CHANGES THAT WILL CONTRIBUTE TO A MORE EFFECTIVE PCB SPILL PREVENTION AND CONTROL POLICY:

No improvements are planned for this unit. LORSTA Kargaburun will be decommissioned approximately 1994.

G. FACILITY DRAINAGE

SKETCH STORAGE AREA DRAINAGE, DRAINAGE CONTROLS, AND NEARBY WATERWAYS ON THE FOLLOWING PAGE FOR REFERENCE IN THIS SECTION. (IF DRAINAGE CONTROLS IN THE FORM OF SECONDARY CONTAINMENT ARE COMPLETELY IMPRACTICAL, REFER TO SECTION L.)

1. DRAINAGE FROM DIKED AREAS IS CONTROLLED AS FOLLOWS

(INCLUDE OPERATING DESCRIPTION OF VALVES, PUMPS, EJECTORS (ECT)).

Leaks in the storage and use areas will not need draining and rainwater is not a factor. Solvents and sorbents are the primary items used for spill clean-up. There are no drains within the use and storage areas.

2. DRAINAGE FROM UNDIKED AREAS IS CONTROLLED AS FOLLOWS

(INCLUDE DESCRIPTION OF CATCHMENT BASINS AND OTHER METHODS OF RETAINING AND/OR RETURNING PCB'S TO FACILITY

No undiked areas or outside storage.

I. SECURITY

THOSE AREAS USED FOR STORING PCB'S PCB MATERIALS, PCB CONTAINERS ARE TO BE PROVIDED WITH ADEQUATE SECURITY SO AS TO PREVENT PCB RELEASES DUE TO VANDALISM OR ACCIDENTAL RELEASE.

1. DESCRIBE UTILITY PROVISIONS FOR EACH OF THE FOLLOWING:

A. FENCING

9' Security fencing around entire station. No fencing around transmitter building. Unit has 24 hour security guards and patrols provided by Turkish Army.

B. LIGHTING:

The outside of the building is illuminated with flood lights. Ample lighting is provided inside the building.

C. TRAFFIC CONTROL:

Not a factor. The transmitter building is isolated from Base traffic with only a service road for access.

D. LOCKED SECURITY OF STORAGE AREAS:

The Transmitter building is locked at all times when maintenance personnel are not present. The duty Electronics Technician, Senior Technical Officer, and Commanding Officer have keys to this facility.

J. TRANSPORTATION

1. DESCRIBE PREARRANGED PLANS FOR TRANSPORTING PCB-ARTICLES
AND/OR FLUIDS:

Transport of capacitors to LORSTA Kargaburun is done by commercial transportation

All PCB articles or debris for disposal will be packed and overpacked in
approved containers and shipped via commercial carrier to a disposal site.

A. TITLE OF UTILITY OFFICIAL RESPONSIBLE FOR PCB TRANSPORT
ARRANGEMENTS:

Senior Technical Officer PHONE # 13

B. TITLE OF UTILITY OFFICIAL TO BE NOTIFIED IN EVENT OF
TRANSPORTATION-RELATED SPILL:

Senior Technical Officer PHONE # 13

2. DESCRIBE LOADING AND UNLOADING PROCEDURES FOR PCB
ARTICLES, CONTAINERS, AND/OR FLUIDS:

Load and unload away from drains. Treat drums and other PCB materials
as fragile. Eliminate traffice from area. Report leaking articles.

3. DESCRIBE PRECAUTIONS TAKEN BY UTILITY CARRIERS AND/OR
DEMANDED OF CONTRACTED CARRIERS TO PREVENT AND DEAL WITH
PCB SPILLS DURING TRANSPORATION:

Load and unload away from drains. Review notification procedures to
be followed in the event of a spill. Properly label all waste containers.
Keep records of all shipments. Inspect vehicle and provide special
instructions in writing. At destination, report any leaking materials
immediately.

K. TRAINING PROCEDURES

1. INDICATE WHETHER PERSONNEL ARE PROPERLY INSTRUCTED IN THE FOLLOWING:

(A) OPERATION OF EQUIPMENT TO PREVENT PCB RELEASES:

YES

(B) THEIR RESPONSIBILITIES IN THE NOTIFICATION PROCESS:

YES

(C) APPLICABLE POLLUTION CONTROL RULES AND REGULATIONS:

YES

(D) OPERATION OF EQUIPMENT USED IN PCB SPILL CLEANUP:

YES

(E) INSPECTION PROCEDURES:

YES

2. THE PROCEDURES EMPLOYED IN THE PROCESS OF INSTRUCTION ARE AS FOLLOWS:

Spill awareness drills conducted for employees associated with PCBs.

Supervisors conduct hypothetical training tests by using realistic

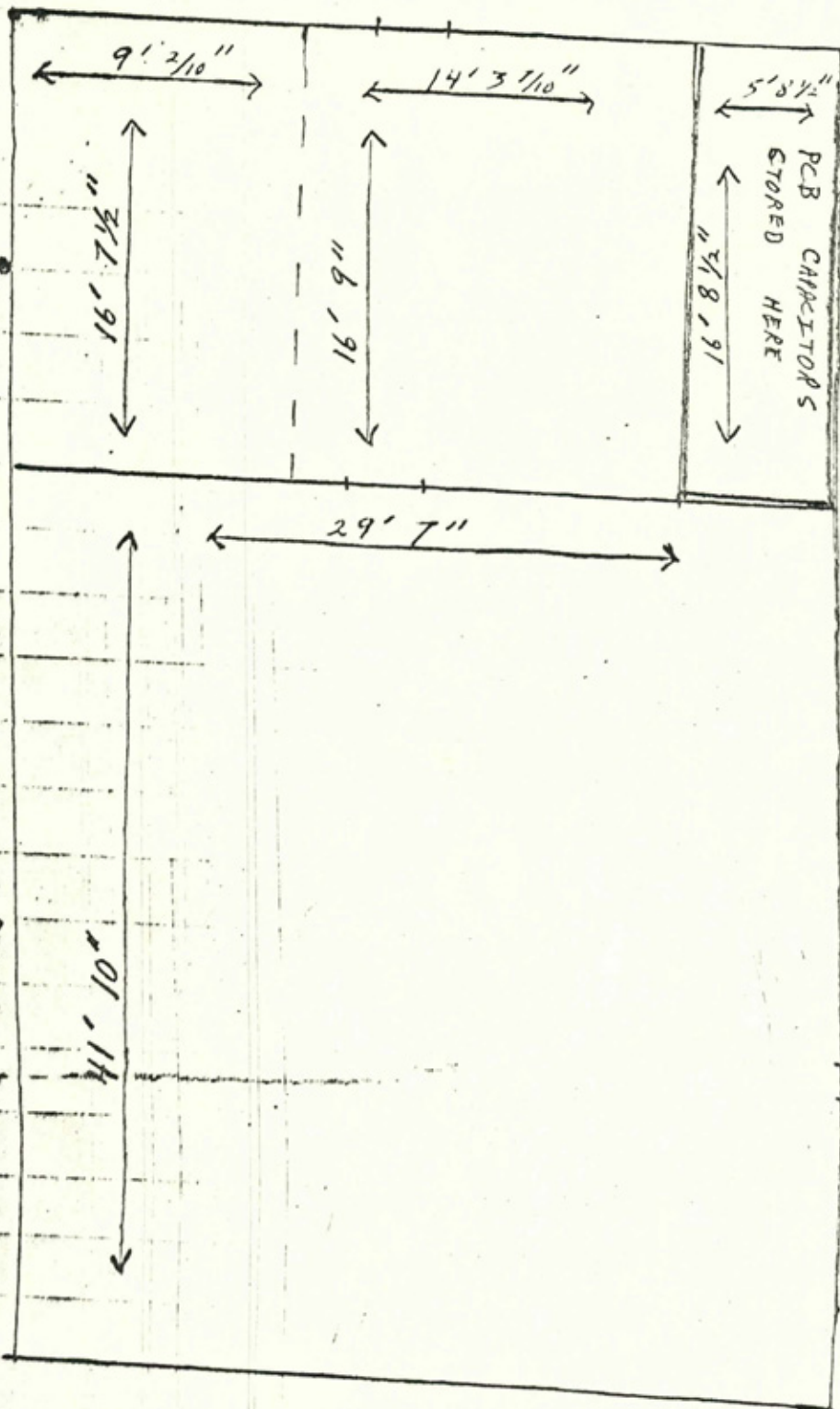
amounts of water in a spill situation. After the exercise, a debriefing

period follows to answer any questions or voice concerns. Personnel
are orally tested after each drill.

3. THE ABOVE INSTRUCTION IS REPEATED AS REQUIRED BY CURRENT REGULATIONS SO AS TO INSURE COMPLETE UNDERSTANDING OF THE SPCC PLAN:

xxx
(YES) (NO)

—: 3"



M. SPILL CONTINGENCY PLANNING

IF CONTAINMENT DEVICES OR OTHER DIVERSION METHODS ARE
CLEARLY IMPRACTICAL, THE FOLLOWING MUST BE COMPLETED AS
REPLACEMENTS:

- A CLEAR DEMONSTRATION OF WHY CONTAINMENT PRACTICES ARE
IMPRACTICAL FOR A PARTICULAR UTILITY FACILITY
- OIL SPILL CONTINGENCY PLAN (ITEMS 2-6)
- A WRITTEN COMMITMENT OF MANPOWER, EQUIPMENT AND
MATERIALS REQUIRED TO CONTROL AND REMOVE PCB
SPILLS (ITEMS 6, 7)

1. DEMONSTRATE BEYOND A REASONABLE DOUBT WHY CONTAINMENT OR
DIVERSIONARY PROCEDURES ARE IMPRACTICAL FOR THIS
FACILITY

Although the completion of a spill contingency plan is not required
since containment is provided for PCB spill situations, LORSTA has
completed this section to further LORSTA's spill prevention control
and countermeasure procedures.

M. SPILL CONTINGENCY PLANNING (CONT)

2. DESCRIBE GENERAL PLAN OF ACTION UPON RECEIVING NOTIFICATION OF A PCB SPILL. CITE SPECIFIC RESPONSIBILITIES OF CENTRAL UTILITY OFFICIALS AS WELL AS PROVISIONS FOR NOTIFYING THE U.S. COASTGUARD, THE REGIONAL EPA EMERGENCY RESPONSE CENTER AND STATE AND LOCAL POLLUTION CONTROL AUTHORITIES IN THE EVENT OF A MAJOR SPILL.

LORSTA's basic plan of action is shown on figure (4). Any personnel detecting a spill reports to the immediate supervisor, who in turn contacts the STO or CO. If a spill escapes the normal containment measures or exceeds 20 gallons, the U.S. Coast Guard Activities Europe 9-9-944-1872-0943, Cak Makli Army base 9-9-1836-1448 will be contacted for assistance. Point of contact is Capt. Mercham.

Coast Guard LORAN Station Kargaburun

Plan of Action

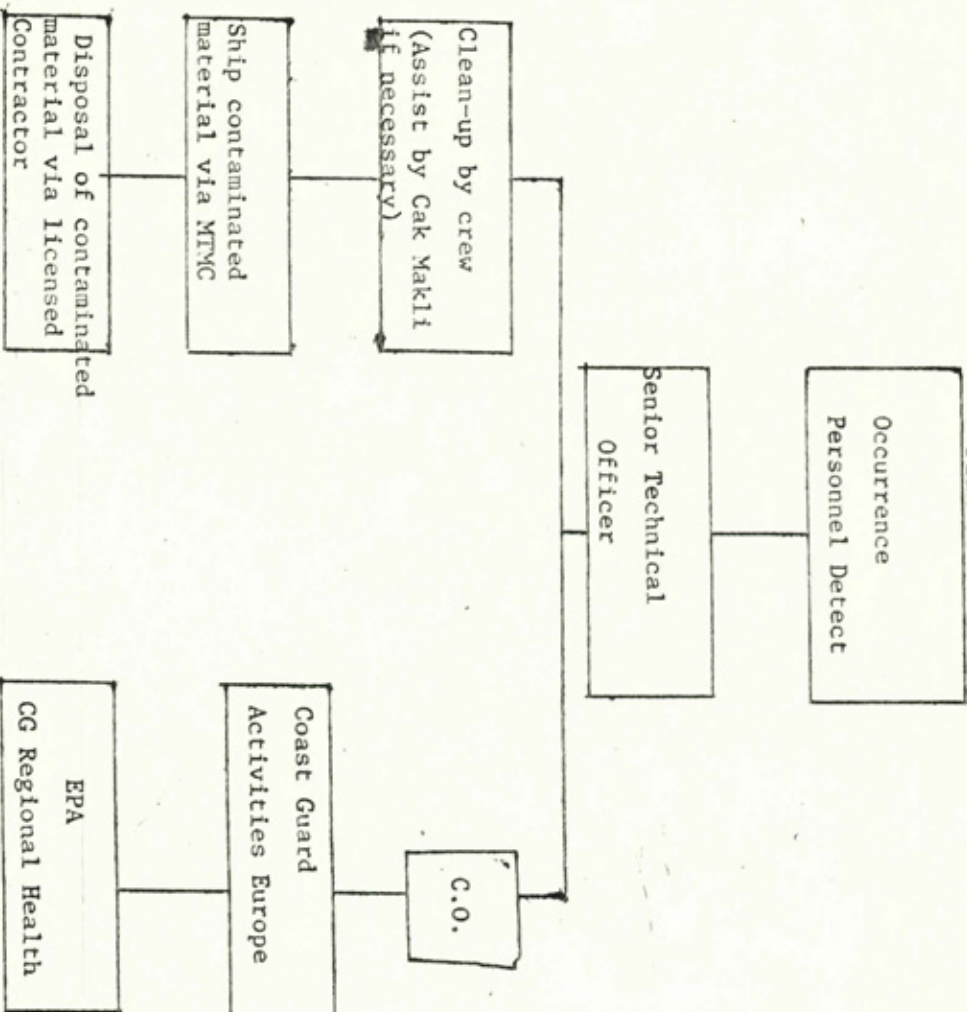


FIGURE 4

M. SPILL CONTINGENCY PLANNING

(CONT) Clean-up Procedures: Upon discovery of a PCB spill of any amount, the

following actions should be taken:

Notify the STO immediately giving the following information: Time of spill;
location of spill, including the type of terrain, nearest water, nearest
drains, present and anticipated movement of spill; estimated volume of
spill, type of clean-up operation initiated and time initiated; effectiveness
of clean-up operations; pertinent weather conditions; persons onscene.
STO shall contact CO, CG Activities Europe, and other agencies as
necessary. Dispatch absorbent material, equipment and personnel as
necessary to clean-up and contain the spill. Secure help from outside
sources if necessary.

Prepare and submit a written report to Commander (ECV) CG Activities Europe
via the CO as soon as possible. The report shall include the following:

Amount of spill and type of device involved

Existing weather conditions, and if they were a factor

Measures taken to control and clean up the spill

actions taken and suggestions to prevent future spills.

M. SPILL CONTINGENCY PLANNING (CONT)

3. DESCRIBE ALL COMMUNICATION SYSTEMS ESTABLISHED ON 24 HOUR PER DAY BASIS TO PERMIT EXPEDITIOUS NOTIFICATION IN THE EVENT OF A PCB RELEASE. _

8 hand held portable two way UHF band transceivers (5 Watt)

Sound powered phones are readily available with the notification procedure posted nearby. Landline teletype. Commercial and Autovon telephone lines.

100 Watt Two way HF Radio communications. Two Pulse Comms via the LORAN system. Satellite Communications system.

4. DESCRIBE GENERAL FACILITY CLEANUP PROCEDURES. INDICATE SPECIAL METHODS FOR DEALING WITH MAJOR SPILLS INTO WATER BODYS AND SEWERS SYSTEMS:

LORSTA has to rely primarily on in-house capabilities and manpower.

Assistance is available from Cak Makli Army base in the event of a large spill. Cak Makli's equipment includes a specially fitted truck, life support equipment, sorbents, and specialty hand tools. Cak Makli point of contact is Capt. Mercham.

M. SPILL CONTINGENCY PLANNING (CONT)

5. RESPONSIBILITY FOR ANY NECESSARY FOLLOW UP OR WRITTEN
REPORTS BELONGS TO:

TITLE: Senior Technical Officer

OFFICE: 13

6. INDICATE ALL PERSONNEL BY TITLE WHO ARE ACQUAINTED WITH
PCB SPILL CONTROL AND CLEANUP PROCEDURES AND CAN BE CALLED
UPON IN THE EVENT OF A PCB SPILL ANYTIME IN A 24 HOUR
PERIOD:

TITLE STO OFFICE PHONE # 13 Barracks 10

HOME PHONE #

TITLE CO OFFICE PHONE # 11

HOME PHONE # 12

TITLE OFFICE PHONE #

HOME PHONE #

TITLE OFFICE PHONE #

HOME PHONE #

7. ITEMIZE EQUIPMENT AND/OR MATERIALS AVAILABLE FOR PCB

SPILL CONTROL AND CLEANUP AND LOCATION(S) OF SUCH EQUIP.

LORSTA provides equipment where the PCBs are used and stored. The equipment

includes sorbent, self-contained breathing apparatus, shovel, broom, dust
pan, solvent, plastic bags, PCB signs, disposable PCB gloves, disposable
plastic pants, jacket and boots, rags, sealable drums with overpacks,
plastic eye shields, hand cleaner.

N. SPILL HISTORY

COMPLETE THIS FORM IF A PCB SPILL HAS OCCURRED BEFORE MAY 31, 1979:

NAME AND ADDRESS OF FACILITY: _____

TYPE OF FACILITY: _____

TITLE OF OFFICIAL: _____

DATE _____ VOLUME: _____

CAUSE AND DESCRIPTION OF SPILL: _____

CORRECTIVE ACTION TAKEN: _____

PLANS FOR PREVENTING RECURRENCE: _____

PCB PROTECTIVE EQUIPMENT SUPPLIERS

1. DISPOSABLE COVERABLE THAT IS IMPERVIOUS TO PCBs WITH ZIP FRONT AND ATTACHED NON-SKID SHOES.

PRODUCT IDENTIFICATION

574 TYVEK

SOURCE

MELCO

6603 GOVERNOR

PRINTZ BLVD.

WILMINGTON, DE 19809

TEL : 800-441-9749

2120Z WITH

ATTACHED 2200 SHOE COVER

DURAFAB

P.O. BOX 658

CLEBURNE, TX 76031

TEL: 800-433-1824

2. PROTECTIVE NEOPRENE TYPE GLOVE CAN BE PURCHASED FROM ANY LOCAL SUPPLIER OF SAFTY EQUIPMENT.
3. RESPIRATORS, NIOSH APPROVED FULL FACEPIECE SELF CONTAINED BREATHING APPARATUS OR FULL FACEPIECE TYPE C CONTINUOUS FLOW SUPPLIED AIR RESPIRATOR, CAN BE PURCHASED FROM ANY SUPPLIER OF SAFTY EQUIPMENT.

• LISTED SOURCES ARE NOT ALL INCLUSIVE AND IN NO WAY IS THIS LIST INTENDED TO WAIVE PREVAILING REGULATIONS REGARDING COMPETITIVE PROCUREMENT. HOWEVER, ANY ABILITY COMPLY WITH THE SPECIFICATION.

PCB DISPOSAL

A REGION	FACILITY/LOCATION	FAC/TYPE	OP AGENCY POC	COMMENTS
II	MODEL CITY, NY	SECURE LANDFILL	SCA CHEMICAL WASTE SERVICES INC. S. ODOJEWSKI (716)754-8231	ACCEPTS ONLY DRAINED AND FLUSHED XFMRS, NO LIQUID PCB
II	NIAGARA FALLS NY	SECURE LANDFILL	SECO CHEMICAL WASTE SYSTEM INC. W. PIERRE (716)731-3281	ACCEPTS ONLY DRAINED AND FLUSHED XFMRS. HAVE LF IN OHIO
IV	SUMTER CO., AL	LANDFILL	WASTE MAN. OF ALABAMA A. MEDY (205)652-9531	WILL HANDLE ALL PCB WASTE
IX	CASMALIA, CA	LANDFILL	CASMALIA DISPOSAL K. HUNTER, JR (805)969-4703	ACCEPTS ONLY DRAINED AND FLUSHED TRANSFORMERS
	GRAND VIEW, ID	MISSILE SILOS	WES-CON, INC G. RINEHOLD (208)834-2275	ACCEPTS ONLY DRAINED AND FLUSHED TRANSFORMERS
X	ARLINGTON, OR	LANDFILL	CHEM-NUCLEAR SYSTEMS, INC MR. F. DEMENT (503)223-1912	WILL NOT ACCEPT PCB FROM EAST OF THE ROCKIES.
IX	BEATTY, NV	LANDFILL	NUCLEAR ENG- ENGINEERING CO MR. CARPENTER (702)426-7160	ACCEPTS ONLY DRAINED AND FLUSHED TRANSFORMERS

PCB SERVICE COMPANIES

Company	Address	Contact/phone#	Services
Transformer Services, Inc	P.O. Box 2144 Akron, Ohio 44309	Mr. Al Sawan	Cleanup, removal Storage Disposal
High Voltage	7200 Industrial Park Blvd Mentor, Ohio	Gerald Bydash (216)951-2706	Cleanup, removal Storage Disposal
Holly Elect Corporation	555 N Ellis Rd Jacksonville, Fl 32205	Gary King (904)783-3700	Cleanup, Removal Storage Disposal
Secos, Inc	2001 C Greentree Executive Campus Route 73 Marlton, NJ 08053	John Perone	Cleanup, Removal Storage Disposal
Waste Management Inc.	2131 Kingston Court S.E. Suite 112 Marietta, Ga 30067	Mr. Al McCoy (800)141-7829	Cleanup, Removal Storage Disposal
General Electric Co.	777 14th St N.W. Washington, D.C. 20005	Richard Hopkins (202)637-4359	Cleanup, Removal Storage Disposal

Listed sources are not all inclusive and in no way is this list intended to waive prevailing regulations regarding competitive procurement. However, any unnamed source desiring to submit a proposal must clearly demonstrate its ability to comply with the specification.

PCB INVENTORY RECORD
USCG LORAN STATION KARGABURUN TU

IN SERVICE		STOR.				LIQ	
PCB ITEM	TOTAL NR.	TOTAL LIQUID BT	IDENTIFICATION EACH ITEM	LOCATION	STATUS	PCB LABEL	DATE
CAPACITOR	12	PCBs (KG) 12.72 KG Each 152.64 KG Total	9A5410-00-188-1447 TK20020	TRANSMITTER BLDG	800 LIDE 4 SPRAY	YES	5/1/90

When shipping PCBs and PCB items to either storage or disposal, a bill of lading must accompany the shipment with enough copies so that:

- Transfer driver signs all copies and you keep one
- Ch² drivers - new driver signs them and old driver keeps a copy
- Pe² receiving PCB shipment at storage or disposal f² ty signs all copies, ves copy to driver, sends one copy to originator, d retains

USCG LORAN STATION KARGABURUN, TU
PCB ITEM INSPECTION LOG SHEET

ITEM:
NSN:
LOCATION:

SIZE(WxLxH):
TOTAL LIQUID WT PCB (KG):

[illegible]