

PCBs Screening Assessment Form – Part 2

Include/attach a copy of completed “PCBs Screening Assessment Form – Part 1”

Instructions:

Complete this form if the “PCBs Screening Assessment Form - Part 1” form directs you to complete Part 2. Obtain BASMAA’s “Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition” (Protocol), dated August 2018, from the city/town Building Department or West Valley Clean Water Program website www.cleancreeks.org, in order to complete this form.

Key Definitions

Priority Building Materials are: 1) Caulk, 2) Thermal insulation, 3) Fiberglass insulation, 4) Adhesive mastics, and 5) Rubber window gaskets.

Buildings are structures with a roof and walls standing more or less permanently in one place. Buildings are intended for human habitation or occupancy.

Demolition means the wrecking, razing, or tearing down of any building. The definition is intended to be consistent with the demolition activities undertaken by contractors with a C-21 Building Moving/Demolition Contractor’s License.

Applicable Structures are defined as buildings constructed or remodeled between January 1, 1950 and December 31, 1980. Wood framed buildings and single-family residential buildings are not applicable structure regardless of the age of the building.

Note: Fluorescent light ballasts, polyurethane foam furniture, and Askarel fluid used in transformers, all of which may contain PCBs, are typically managed during pre-demolition activities under current regulations and programs that require removal of universal waste and outdated transformers. For this process it is assumed that those materials will be evaluated and managed under those existing programs.

<p>Choose option 1 or 2 for reporting concentrations of PCBs in priority building materials. It is anticipated that prior sampling results/records will rarely be available and that most applicants will need to use option 1.</p>	
<p><input type="checkbox"/> Option 1: Use consultant/contractor to conduct representative sampling and analysis of the priority building materials.</p> <ul style="list-style-type: none"> • Summarize results on Priority Building Materials Tables (attached); and • Provide the following supporting information: <ul style="list-style-type: none"> <input type="checkbox"/> Contractor’s report documenting the evaluation results (See Section 3 of Protocol. Also, template attached); <input type="checkbox"/> QA/QC checklist (<i>page 3</i>); and <input type="checkbox"/> Copies of the analytical data reports. 	<p><input type="checkbox"/> Option 2: Use consultant/contractor to summarize existing sampling results/records of the priority building materials.</p> <ul style="list-style-type: none"> • Summarize results on Priority Building Materials Tables (attached); and • Provide the following supporting information: <ul style="list-style-type: none"> <input type="checkbox"/> Contractor’s report/statement that the results are consistent with the <i>Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition</i>. <input type="checkbox"/> Copies of the analytical data reports.

Consultant/contractor: To find a contractor to do testing, contact the Association of Environmental Contractors (AEC) at aec-ca.org or the Association of Northern California Environmental Consultants (ANCEC) at ancec-ncal.com.

Disclaimer

The material presented in this document is intended solely for the implementation of a municipal regulatory program required by the San Francisco Bay Area Regional Water Quality Control Board Municipal Regional Stormwater Permit (MRP) for the protection of water quality under the Clean Water Act. This document does not address other environmental programs or regulations (e.g., PCBs regulations under the Toxic Substances Control Act (TSCA); federal, state, or local regulations for hazardous material handling and hazardous waste disposal; health and safety practices to mitigate human exposure to PCBs or other hazardous materials; recycling mandates; and abatement at sites with PCBs (or other contaminants). The applicant is responsible for knowing and complying with all relevant laws and regulations. This screening process is part of a program for water quality protection and was designed in accordance with requirements in the MRP. It does not address other environmental programs or regulations (e.g., PCBs regulations under the Toxic Substances Control Act (TSCA); federal, state, or local regulations for hazardous material handling and hazardous waste disposal; health and safety practices to mitigate human exposure to PCBs or other hazardous materials; recycling mandates; or abatement at sites with PCBs (or other contaminants). **The applicant is responsible for complying with all relevant laws and regulations. See the “Notices to Applicants” section, attached, for important additional information.**

Owner Information		
Name		
Address		
City	State	Zip
Contact (Agent)		
Phone	Email	

Certification and Owner/Consultant Information: All applicants must complete the certification. The certification must be signed by the property owner or the owner’s agent or legal representatives and the consultant completing the application form.

<p>I certify that the information provided in this PCBs Screening Assessment Form – Part 2, is, to the best of my knowledge and belief, true, accurate, and complete. I further certify that I understand my responsibility for knowing and complying with all relevant laws and regulations related to reporting, abating, and handling and disposing of PCBs materials and wastes. I understand there are significant penalties for submitting false information. I will retain a copy of this form and the supporting documentation for at least 5 years.</p>		
Signature: _____	Print: _____	Date: _____
(Property Owner//Agent/Legal Representative)		
Signature: _____	Print: _____	Date: _____
(Consultant Completing Application Form)		

Priority Building Material Tables: Determine whether PCBs are present at a concentration equal to or greater than 50 parts per million (ppm) in prioritized building materials such as: caulk, insulation, mastic, and window gaskets.

Instructions:

- Each page of the tables is for a different material. Duplicate the pages as needed to report all concentration data.
- A blank page is provided. Applicants have the option of submitting PCBs concentration data on other materials in addition to the priority building materials.
- Column 1: required for all priority building material PCBs concentrations. Provide short description of the sample location, concentration.
- Column 2: only required for PCBs concentrations ≥50 ppm. Use to estimate the amount of material associated with each sample.

Priority Building Material Table		
Caulk:		
<i>Column 1. Report all PCBs concentrations for each homogeneous area of caulking area (see Page 31, Section 2.2.2). Use sample designators/descriptions from laboratory report.</i>		<i>Column 2. Complete for each concentration ≥ 50 ppm</i>
Caulk Application Sample Description	Concentration (mg/kg)	Estimate Amount of Material (in Linear Feet)
Example: Caulk Sample 1	320	48
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

Priority Building Material Table		
Fiberglass Insulation:		
<i>Column 1. Report all PCBs concentrations for each homogeneous area (see Page 31, Section 2.2.2). Use sample designators/descriptions from laboratory report.</i>		<i>Column 2. Complete for each concentration ≥ 50 mg/kg</i>
Fiberglass Insulation Application Sample Description	Concentration (mg/kg)	Estimate Amount of Material (in Square Feet)
Example: Fiberglass Insulation Sample 1	78	86
11.		
12.		
13.		
14.		
15.		
16.		
17.		
18.		
19.		
20.		

The area of insulation wrapped around a pipe may be estimated using the following formula:

Area (square feet) = $2\pi rh$; where r is the pipe radius (feet) and h is the pipe length (feet).

Priority Building Material Table		
Thermal Insulation:		
<i>Column 1. Report all PCBs concentrations for each homogeneous area (see Page 31, Section 2.2.2). Use sample designators/descriptions from laboratory report.</i>		<i>Column 2. Complete for each concentration ≥ 50 mg/kg</i>
Thermal Insulation Application Sample Description	Concentration (mg/kg)	Estimate Amount of Material (in Square Feet)
Example: Thermal Insulation Sample 1	20	
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

The area of insulation wrapped around a pipe may be estimated using the following formula:

Area (square feet) = $2\pi rh$; where r is the pipe radius (feet) and h is the pipe length (feet).

Duplicate page if additional space is needed.

Priority Building Material Table		
Adhesive Mastic Insulation:		
<i>Column 1. Report all PCBs concentrations for each homogeneous area (see Page 31, Section 2.2.2). Use sample designators/descriptions from laboratory report.</i>		<i>Column 2. Complete for each concentration ≥ 50 mg/kg</i>
Adhesive Mastic Insulation Application Sample Description	Concentration (mg/kg)	Estimate Amount of Material (in Square Feet)
<i>Example: Adhesive Mastic Insulation Sample 1</i>	87.4	800
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

Duplicate page if additional space is needed.

Priority Building Material Table		
Rubber Window Gasket:		
<i>Column 1. Report all PCBs concentrations for each homogeneous area (see Page 31, Section 2.2.2). Use sample designators/descriptions from laboratory report.</i>		<i>Column 2. Complete for each concentration ≥ 50 mg/kg</i>
Rubber Window Gasket Application Sample Description	Concentration (mg/kg)	Estimate Amount of Material (in Linear Feet)
Example: Window Gasket Insulation Sample 1	70	75
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

Duplicate page if additional space is needed.

Priority Building Material Table		
Other:		
<i>Column 1. Optional: Use this form to report PCBs concentration data from materials other than priority building materials. Report PCBs concentrations for each material and homogeneous area. Use sample designators/descriptions from laboratory report.</i>		<i>Column 2. Complete for each concentration ≥ 50 mg/kg</i>
Material Sample Description	Concentration (mg/kg)	Estimate Amount of Material (units vary)
<i>Example: Wall paint Sample 1</i>	228	1500 Square Feet
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		

Duplicate page if additional space is needed.

Notices to Applicants

Regarding Federal and State PCBs Regulations

Applicants that determine PCBs exist in priority building materials must follow applicable federal and state laws. This may include reporting to U.S. Environmental Protection Agency (USEPA), the San Francisco Bay Regional Water Quality Control Board, and the California Department of Toxic Substances Control (DTSC). These agencies may require additional sampling and abatement of PCBs.

Depending on the approach for sampling and removing building materials containing PCBs, you may need to notify or seek advance approval from USEPA before building demolition. Even in circumstances where advance notification to or approval from USEPA is not required before the demolition activity, the disposal of PCBs waste is regulated under Toxic Substances Control Act (TSCA).

Additionally, the disposal of PCBs waste is subject to California Code of Regulations (CCR) California Code of Regulations (CCR) Title 22, Section Division 4.5, Chapter 12, Standards Applicable to Hazardous Waste Generators.

Building owners and employers need to consider worker and public safety during work involving hazardous materials and wastes including PCBs.

Federal and State Regulations

Building materials containing PCBs at or above 50 ppm that were manufactured with PCBs (e.g., caulk, joint sealants, paint) fall under the category of PCBs bulk product wastes. See 40 Code of Federal Regulations (CFR) 761.3 for a definition of PCBs bulk product wastes.

Building materials such as concrete, brick, metal contaminated with PCBs are PCBs remediation wastes (e.g., concrete contaminated with PCBs from caulk that contains PCBs). 40 CFR 761.3 defines PCBs remediation wastes.

Disposal of PCBs wastes are subject to TSCA requirements such as manifesting of the waste for transportation and disposal. See 40 CFR 761 and 40 CFR 761, Subpart K.

TSCA-regulated does not equate solely to materials containing PCBs at or above 50 ppm. There are circumstances in which materials containing PCBs below 50 ppm are subject to regulation under TSCA. See 40 CFR 761.61(a)(5)(i)(B)(2)(ii).

Disposal of PCBs wastes are subject to California Code of Regulations (CCR) Title 22, Section Division 4.5, Chapter 12, Standards Applicable to Hazardous Waste Generators.

California hazardous waste regulatory levels for PCBs are 5 ppm based on the Soluble Threshold Limit Concentration test and 50 ppm based on the Total Threshold Limit Concentration test, see CCR, Title 22, Section 66261.24, Table III.

Agency Contacts

Applicants should contact the appropriate agencies and review the relevant guidance and information about PCBs in building materials. Municipal staff are not able to advise you on the requirements of the applicable federal and state laws.

Agency	Contact	Useful Links
US Environmental Protection Agency	Steve Armann (415) 972-3352 armann.steve@epa.gov	https://www.epa.gov/pcbs (EPA PCB website) https://www.epa.gov/pcbs/questions-and-answers-about-polychlorinated-biphenyls-pcbs-building-materials (PCBs in Building Materials Fact Sheet and Q/A Document) https://www.epa.gov/pcbs/pcb-facility-approval-streamlining-toolbox-fast-streamlining-cleanup-approval-process (USEPA PCB Facility Approval Streamlining Toolbox (PCB FAST)) https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials#Test-Methods (See Information for Contractors Working in Older Buildings that May Contain PCBs)
San Francisco Bay Regional Water Quality Control Board	Jan O'Hara (510) 622-5681 Janet.O'Hara@waterboards.ca.gov Cheryl Prowell (510) 622-2408 Cheryl.Prowell@waterboards.ca.gov	https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sfbaypcbstmdl.shtml https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/sitecleanupprogram.html
Department of Toxic Substances Control	Regulatory Assistance Office 1-800-72TOXIC RAO@dtsc.ca.gov	http://www.dtsc.ca.gov/SiteCleanup/Brownfields/upload/PUB_SMP_Guide-to-Selecting-a-Consultant.pdf
California Division of Occupational Safety and Health (known as Cal/OSHA)	CalOSHA Consultations Services 1-800-963-9424	https://www.dir.ca.gov/dosh/consultation.html

QA/QC Checklist

For this program, general quality assurance and quality control (QA/QC) procedures will be utilized. The following checklist should be used by the consultant performing the evaluation:

- Proper specified sampling equipment was used (pre-cleaned or other, stainless steel);
- Proper decontamination procedures were followed;
- Sampling collection spatial frequency was met;
- A National Environmental Laboratory Accreditation Program (NELAP) laboratory was utilized;
- Samples were received by the laboratory within proper temperature range;
- Samples were extracted and analyzed within the method holding time for EPA Method 8082/8082A; and
- Sample reporting limit met data quality objectives.

**Template for Consultant’s Report from Pre-demolition PCBs Building Survey
(page 1 of 2)**

Demolition Site Information		
Brief description of building, including construction type (e.g., concrete frame, masonry, steel frame, pre-engineered):		
Address		
City	State	Zip
Date(s) that the PCBs building survey was conducted:		
Consultant Information		
Firm Name		
Address		
City	State	Zip
Contact Person		
Telephone	Email	
Consultant’s Demolition Site Contact (e.g., property owner, project proponent, or agent)		
Name		
Telephone	Email	
Certified Analytical Laboratory Information		
Name		
Address		
City	State	Zip

**Template for Consultant's Report from Pre-demolition PCBs Building Survey
(page 2 of 2)**

Describe the survey methods, including:

- Sampling procedures
- Number of samples collected
- Sample identification numbers
- Types of materials sampled (attach example photographs for each material type)
- Descriptions of sample locations (attach maps)

Provide a summary of the testing results, including:

- PCBs concentration in each sample of priority building material that was collected.
- Estimated amount of material (in linear feet for caulking or rubber window gaskets, or square feet for mastics/adhesives or insulation) associated with each sample with a PCBs concentration ≥ 50 ppm (note: this information is needed to complete the Part 3 Tables beginning on page 14 of the Applicant Package):

Check boxes to indicate that the following documents are attached:

- Analytical laboratory reports
- QA/QC checklist