

PCBs Screening Assessment Form – Part 2

Complete this form if “PCBs Screening Assessment Form - Part 1” directs you to “complete Part 2 and submit to Building Department with demolition permit application”. Attach completed “Part 1” to this form.

Proposed Demolition Site:	
Address:	City:

Instructions:

1. Obtain BASMAA’s “**Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition**”, (2018, revised November 2019), from the city/town Building Department or West Valley Clean Water Authority website www.cleancreeks.org.
2. Select Option 1 or 2 and report PCBs concentrations in the priority building materials and the source of data for each of the priority building materials. Provide the required supporting information.
3. Complete this form and sign Certification(s).
4. Provide completed form(s) to the City/Town Building Department with demolition permit application.

Questions? Call City/Town Building Department. Campbell (408) 866-2100, Los Gatos (408) 354-6876, Monte Sereno (408) 354-2805, Saratoga (408) 868-1240.

<input type="checkbox"/> Option 1: Use Consultant to conduct representative sampling and analysis of the priority building materials. <ol style="list-style-type: none"> 1. Summarize results in Tables provided (Attachment A) for each priority building material; and 2. Provide the following supporting documentation (required): <ul style="list-style-type: none"> <input type="checkbox"/> Consultant’s report documenting the assessment results <input type="checkbox"/> QA/QC checklist (page 6) <input type="checkbox"/> Copies of the analytical data reports. 	<input type="checkbox"/> Option 2: Use Consultant to summarize existing sampling records of the priority building materials. <ol style="list-style-type: none"> 1. Summarize results in Tables provided (Attachment A) for each priority building material; and 2. Provide the following supporting documentation (required): <ul style="list-style-type: none"> <input type="checkbox"/> Consultant’s report/statement documenting 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.
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Note: if a material has been determined to contain asbestos, lead or other hazardous substances and will be abated under an associated waste program, that material need not be sampled for PCBs under this program.

Key Definitions:

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

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.

Owner Information		
Name		
Address		
City	State	Zip
Contact (if different)		
Phone	Email	
Consultant Information		
Firm Name		
Address		
City	State	Zip
Contact:		
Phone:	Email:	

Disclaimer

This screening process is part of a program for water quality protection and was designed in accordance with requirements in the Bay Area regional municipal stormwater NPDES permit (referred to as the Municipal Regional Permit). This process **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 knowing and complying with all relevant laws and regulations. See the Federal and State PCBs Regulations section for additional information.**

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.

Certification	All Applicants must complete
<p>I certify that the information provided in this form 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> <p>I further certify that if the demolition site has an Applicable Structure¹ <u>containing building materials with PCBs concentrations of 50 ppm or greater</u>² at the time such structure undergoes demolition:</p> <p>(1) I will notify the City/Town, the San Francisco Bay Regional Water Quality Control Board, and U.S. EPA at least five working days in advance of the start of the demolition.</p> <p>(2) Additional notifications:</p> <ul style="list-style-type: none"> a. Within five working days after the demolition is complete, I will notify the City/Town of the actual demolition date(s). b. I will notify the City/Town that advance approval from the U.S. EPA is required for this site within five working days of making this determination.³ c. If it is determined⁴ that advance approval from the U.S. EPA is <u>not</u> required for this site, I will submit the hazardous waste manifest for the disposal of PCBs materials to the City/Town within five working days of it becoming available. If advance approval from the U.S. EPA <u>is</u> required for this site, submittal of the hazardous waste manifest is not required. <p>Print: _____ Signature: _____ Date: _____ (Property Owner/Agent/Legal Representative)</p> <p>Print: _____ Signature: _____ Date: _____ (Consultant/Contractor Completing Application Form)</p>	

¹Applicable Structure is defined as building constructed or remodeled between January 1, 1950 and December 31, 1980. Wood framed buildings and single-family residential buildings are not an Applicable Structure regardless of the age of the building. See *PCBs in Priority Building Materials: Model Screening Assessment Applicant Package, Applicant Instructions for Completing the PCBs Screening Assessment Form*

²If PCBs are detected at concentrations ≥ 50 ppm, MRP Provisions C.12.g.ii (3) and (4) require municipalities to enhance their construction site stormwater program. These requirements may require the implementation of enhanced erosion control, sediment control, and good housekeeping BMPs to minimize migration of PCBs into the storm drainage system during demolition. Check with the municipality issuing the demolition permit for BMP requirements. Additionally, the site may be inspected more frequently to ensure the proper implementation of the BMPs. As noted in Part 4, keep the municipality informed of the demolition schedule.

³Provision C.12.g.iii (4) states: " Beginning with their 2024 Annual Report, Permittees shall provide the following: ...and for those cases where notification and advance approval from the U.S. EPA is not required and were approved for demolition after June 30, 2023, the hazardous waste manifest prepared for transportation of the material to a disposal facility." It appears that the intent is that it is necessary to provide the manifest when EPA is not involved with the site remediation. Under some circumstances (that should be described in available EPA guidance) these types of PCBs remediations can be self-implemented and do not necessarily require any involvement by EPA staff. If self-implemented and EPA is not involved, then the municipality should require the Applicant to submit the manifest to the municipality so that the municipality can provide it in its Annual Report.

⁴The Applicant makes this determination

Notices to Applicants

Applicants that determine PCBs exist in 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 seek advance approval from USEPA before building demolition. Even in circumstances where advance approval from USEPA is not required before the demolition activity, the disposal of PCBs waste is regulated under TSCA and the California Code of Regulations. See below Notes Regarding Federal and State PCBs Regulations.

Notes Regarding Federal and State PCBs Regulations

1. See 40 Code of Federal Regulations (CFR) 761.3 for important information relative to disposal of PCBs-containing building materials, including definitions of PCBs bulk product wastes and PCBs remediation wastes. Also see the memorandum dated October 24, 2012 “PCB Bulk Product Waste Reinterpretation” from Suzanne Rudzinski, Director, Office of Resource Conservation and Recovery, EPA.
2. Disposal of PCBs wastes are subject to the Toxic Substances Control Act (TSCA) requirements such as manifesting of the waste for transportation and disposal. See 40 CFR 761 and 40 CFR 761, Subpart K.
3. 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).
4. 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.
5. 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	Carmen Santos (415) 972-3360 santos.carmen@epa.gov	https://www.epa.gov/pcbs (EPA PCBs 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	Imtiaz-Ali Kalyan (510)622-2499 Imtiaz-Ali.kalyan@waterboards.ca.gov Cheryl Prowell (510) 622-2408 Cheryl.Prowell@waterboards.ca.gov	https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sfbaypcbstdml.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 (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.

Sample template for Consultant's Report (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

Sample template for Consultant's Report (page 2 of 2)

1. 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)

2. 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):

3. Check boxes to indicate that the following documents are attached:

- Analytical laboratory reports
- QA/QC checklist

Attachment A

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:

1. Each page of the tables, starting on page A1, is for a different material. Duplicate the pages as needed to report all concentration data.
2. A blank page is provided. Applicants have the option of submitting PCBs concentration data on other materials in addition to the priority building materials.
3. Column 1: required for all priority building material PCBs concentrations. Provide short description of the sample location and concentration.
4. Column 2: only required for PCBs concentrations ≥ 50 ppm. Use to estimate the amount of material associated with each sample.

Part 3 Caulk Applications Table

Column 1. Report all PCBs concentrations for each homogenous area of caulking area (see Attachment C, Section 3.2.2). Use sample designators/descriptions from laboratory report.

Column 2. Complete for each concentration ≥ 50 ppm

<u>Caulk Application Sample Description</u>	<u>Concentration (mg/kg)</u>	<u>Estimate Amount of Material</u>	<u>Units</u>
<i>Example:</i>			
<i>Caulk Sample 1</i> _____	<i>320</i> _____	<i>48</i> _____	Linear Feet
1. _____			Linear Feet
2. _____			Linear Feet
3. _____			Linear Feet
4. _____			Linear Feet
5. _____			Linear Feet
6. _____			Linear Feet
7. _____			Linear Feet
8. _____			Linear Feet
9. _____			Linear Feet
10. _____			Linear Feet

Duplicate page if additional space is needed.

Part 3 Fiberglass Insulation Applications Table

Column 1. Report all PCBs concentrations for each homogenous area of fiberglass insulation (see Attachment C, Section 3.2.2). Use sample designators/descriptions from laboratory report.

Column 2. Complete for each concentration ≥ 50 mg/kg

<u>Fiberglass Insulation Application Sample Description</u>	<u>Concentration (mg/kg)</u>	<u>Estimate Amount of Material</u>	<u>Units</u>
<i>Example:</i>			
<i>Fiberglass Insulation Sample 1</i> _____	<u>78</u> _____	<u>86</u> _____	Square Feet
1. _____	.	.	Square Feet
2. _____	.	.	Square Feet
3. _____	.	.	Square Feet
4. _____	.	.	Square Feet
5. _____	.	.	Square Feet
6. _____	.	.	Square Feet
7. _____	.	.	Square Feet
8. _____	.	.	Square Feet
9. _____	.	.	Square Feet
10. _____	.	.	Square Feet

To estimate the square footage of insulation wrapped around pipes use the formula to calculate the lateral area of a cylinder $2\pi rh$. Where r is the pipe radius and h is the pipe length. Duplicate page if additional space is needed.

Part 3 Thermal Insulation Applications Table			
Column 1. Report all PCBs concentrations for each homogenous area of thermal insulation (see Attachment C, Section 3.2.2). Use sample designators/descriptions from laboratory report.		Column 2. Complete for each concentration ≥ 50 mg/kg	
<u>Thermal Insulation Application Sample Description</u>	<u>Concentration (mg/kg)</u>	<u>Estimate Amount of Material</u>	<u>Units</u>
<i>Example:</i> <u>Thermal Insulation Sample 1</u>	<u>20</u>	.	Square Feet
1. _____	.	.	Square Feet
2. _____	.	.	Square Feet
3. _____	.	.	Square Feet
4. _____	.	.	Square Feet
5. _____	.	.	Square Feet
6. _____	.	.	Square Feet
7. _____	.	.	Square Feet
8. _____	.	.	Square Feet
9. _____	.	.	Square Feet
10. _____	.	.	Square Feet

To estimate the square footage of insulation wrapped around pipes use the formula to calculate the lateral area of a cylinder $2\pi rh$. Where r is the pipe radius and h is the pipe length. Duplicate page if additional space is needed.

Part 3 Adhesive Mastic Applications Table

Column 1. Report PCBs concentrations for each homogenous area of mastic (see Attachment C, Section 3.2.2. Use sample designators/descriptions from laboratory report.)

Column 2. Complete for each concentration ≥ 50 mg/kg

<u>Adhesive Mastic Application Sample Description</u>	<u>Concentration (mg/kg)</u>	<u>Estimate Amount of Material</u>	<u>Units</u>
<i>Example:</i>			
<i>Adhesive Mastic Sample 1</i> _____	<i>87.4</i> _____	<i>800</i> _____	<i>Square Feet</i>
1. _____			Square Feet
2. _____			Square Feet
3. _____			Square Feet
4. _____			Square Feet
5. _____			Square Feet
6. _____			Square Feet
7. _____			Square Feet
8. _____			Square Feet
9. _____			Square Feet
10. _____			Square Feet

Duplicate page if additional space is needed.

Part 3 Rubber Window Gasket Applications Table

Column 1. Report PCBs concentrations for each gasket (see Attachment C, Section 3.2.2). Use sample designators/descriptions from laboratory report.

Column 2. Complete for each concentration ≥ 50 mg/kg

<u>Rubber Window Gasket Application Sample Description</u>	<u>Concentration (mg/kg)</u>	<u>Estimate Amount of Material</u>	<u>Units</u>
<i>Example:</i>			
<i>Window Gasket Sample 1</i> _____	<i>70</i> _____	<i>75</i> _____	<i>Linear Feet</i>
1. _____			Linear Feet
2. _____			Linear Feet
3. _____			Linear Feet
4. _____			Linear Feet
5. _____			Linear Feet
6. _____			Linear Feet
7. _____			Linear Feet
8. _____			Linear Feet
9. _____			Linear Feet
10. _____			Linear Feet

Duplicate page if additional space is needed.

Part 3 Other Materials Table

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.

Column 2. Complete for each concentration ≥ 50 mg/kg

<u>Material Sample Description</u>	<u>Concentration (mg/kg)</u>	<u>Estimate Amount of Material</u>	<u>Units</u>
<i>Example:</i>			
<i>Wall paint Sample 1</i> _____	<i>228</i> _____	<i>1500</i> _____	<i>Square Feet</i>
1. _____	.	.	.
2. _____	.	.	.
3. _____	.	.	.
4. _____	.	.	.
5. _____	.	.	.
6. _____	.	.	.
7. _____	.	.	.
8. _____	.	.	.
9. _____	.	.	.
10. _____	.	.	.

Duplicate page if additional space is needed.