

# Applicant Instructions for Completing the PCBs Screening Assessment Form

Applicants for demolition permits or other permits that involve the complete demolition of a building must conduct an assessment to screen for PCBs in priority building materials. Use the *PCBs Screening Assessment Form*, to summarize and certify the information needed by the municipality to issue a demolition permit. The form is provided beginning on page 7.

If the project includes the demolition of multiple buildings complete one form for each building to be demolished.

## Part 1. Owner and project information

Complete the owner and consultant information and the project location information.

For the Type of Construction select one of the following options:

- **Wood Frame** (Buildings constructed with lumber or timbers, which make up the studs, plates, joists, and rafters.)
- **Masonry Construction** (Buildings constructed with concrete blocks or bricks as the load bearing walls typically with the floors and ceilings constructed with wooden joists.)
- **Steel Frame Construction** (Buildings constructed with steel studs or steel columns and steel joists or trusses to support floors and roofs. Includes light gauge steel construction and high-rise steel construction.)
- **Concrete Frame** (Buildings constructed with reinforced concrete columns, concrete beams, and concrete slabs.)
- **Pre-Engineered** (Buildings constructed with pre-engineered parts bolted together.)

## Part 2. Is building subject to the screening requirement based on type, use, and age of the building?

Part 2 documents the determination of whether the proposed demolition will affect an applicable structure. If the demolition does not affect an applicable structure, then the assessment is complete, and the form can be certified.

This determination screens out buildings that are a lower priority with regard PCBs-containing materials and provides an off-ramp from the rest of the screening process.

### **Question 2.a: Is the building to be demolished wood framed and/or single family residential?**

- If YES the PCBs Screening Assessment is complete, skip to the certification in Part 4.
- If NO, continue to Question 2.b.

### **Question 2.b: Was the building to be demolished constructed or remodeled between January 1, 1950 and December 31, 1980?**

- If YES continue to Question 2.c.
- If NO, the PCBs Screening Assessment is complete, skip to the certification in Part 4.

### **Key Definitions**

**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.

### **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.

**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.

**Question 2.c: Is the proposed demolition a complete demolition of the building (as defined in key definitions of this document)?**

- If YES continue to Part 3.
- If NO, the PCBs Screening Assessment is complete, skip to the certification in Part 4.

Studies have found the highest concentrations of PCBs in building materials in buildings that were built or remodeled from 1950 to 1980.

**Part 3. Report concentrations of PCBs in priority building materials**

For this process, the date that the building permit was issued will be used to determine applicability.

Part 3 documents the results of the assessment of PCBs concentrations in priority building materials. Part 3 is only required for proposed demolition of an applicable structure, as determined in Part 2. Check the option used.

- **Option 1** Conduct representative sampling and analysis of the priority building materials per BASMAA's *Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition* (dated August 2018) (hereinafter referred to as the *Protocol*).
- **Option 2** Use existing building records for the priority building materials. Applicants who have conducted sampling prior to the publication of the *Protocol* may use that data provided it is consistent with the *Protocol* (e.g., analytical methods, sample collection frequency, QA/QC). It is anticipated that prior sampling results will rarely be available and that most Applicants will need to use Option 1.

**3.a Option 1 – Conduct representative sampling**

Check this box if you conducted representative sampling and analysis of the priority building materials per the *Protocol*.

- Complete the applicable tables for each priority building material.
- Attach the consultant's report<sup>2</sup> documenting the evaluation results.
- Attach (or include in the consultant's report) the QA/QC checklist (see *Protocol*, Section 3.2.4).
- Attach copies of the analytical data reports.

**3.a Option 2 – Use existing building records**

In some cases, a property owner may have conducted sampling of the priority building materials for PCBs. If such data exist, you may use these data to demonstrate the concentration of PCBs in the priority building materials for the PCBs screening. However, if the sampling must be consistent with the *Protocol*.

- Complete the applicable tables for each priority building material.
- Attach the consultant's report/statement that the results are consistent with the *Protocol*.
- Attach copies of the analytical data reports.

**Part 3 Tables Summarize concentrations of PCBs in priority building materials**

Use these tables to summarize the concentrations of PCBs in the priority building materials.

- Each page of the table 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*

- Use column 1 to report all PCBs concentrations in the priority building materials. Provide short description of the sample location and concentration.

<sup>2</sup> The consultant's report of the findings of the PCBs building material evaluation. See section 3 of the *Protocol*.

*Column 2: only required for PCBs concentrations  $\geq 50$  ppm*

- Use column 2 to estimate the amount of material associated with each sample.

#### **Part 4. Certification**

- Complete the certification. The certification must be signed by the property owner or the owner's agent or legal representatives and the consultant who complete the application form.

# PCBs Screening Assessment Form

For Municipality Use Only	
Date Received	
Permit #	

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 Notices to Applicants section in the Applicant Instructions and at the end of this form.**

**Complete all applicable parts of the PCBs Screening Assessment Form and submit with your demolition permit application.**

**All Applicants must complete Part 1, Part 2, and Part 4.**

Part 1. Owner/Consultant and project information		
Owner Information		
Name		
Address		
City	State	Zip
Contact (Agent)		
Phone	Email	
Consultant Information		
Firm Name		
Address		
City	State	Zip
Contact Person		
Phone	Email	
Project Location		
Address		
City	State CA	Zip
APN (s)		
Year Building was Built	Type of Construction	
Estimated Demolition Date		

**Part 2. Is building subject to the PCBs screening requirement based on type, use, and age of the building?**

2.a Is the building to be demolished wood framed and/or single family residential?  Yes  No

If the answer to Questions 2.a is **Yes**, the PCBs Screening Assessment is complete, skip to Part 4.  
If the answer is **No**, continue to Question 2.b.

2.b Was the building to be demolished constructed or remodeled between January 1, 1950 and December 31, 1980?  Yes  No

If the answer to Questions 2.b is **No**, the PCBs Screening Assessment is complete, skip to Part 4.  
If the answer is **Yes**, continue to Question 2.c.

2.c Is the proposed demolition a complete demolition of the building?  Yes  No

If the answer to Questions 2.c is **No**, the PCBs Screening Assessment is complete, skip to Part 4.  
If the answer is **Yes**, complete Part 3.

**All applications affecting applicable structures and demolitions must complete Part 3 and provide required supporting documents.**

**Part 3. Report concentrations of PCBs in priority building materials**

**Option 1.** Applicants conducted representative sampling and analysis of the priority building materials per the Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition (BASMAA, August 2018).

**Option 2.** Applicants possess existing sample results that are that are consistent with the Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition.

3.a Select option 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

<input type="checkbox"/> Option 1 Conduct Representative Sampling <ul style="list-style-type: none"> <li>• Summarize results on Part 3 Tables; and</li> <li>• Provide the following supporting information:                         <ul style="list-style-type: none"> <li><input type="checkbox"/> Consultant’s report documenting the assessment results;</li> <li><input type="checkbox"/> QA/QC checklist (see page 13); and</li> <li><input type="checkbox"/> Copies of the analytical data reports.</li> </ul> </li> </ul> <p>(Part 3 Tables begin on p.14 of the applicant package)</p>	<input type="checkbox"/> Option 2 Use Existing Building Records <ul style="list-style-type: none"> <li>• Summarize results on Part 3 Tables; and</li> <li>• Provide the following supporting information:                         <ul style="list-style-type: none"> <li><input type="checkbox"/> Consultant’s report/statement that the results are consistent with the Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolitions</li> <li><input type="checkbox"/> Copies of the analytical data reports.</li> </ul> </li> </ul>
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**All Applicants must complete Part 4.**

**Part 4. Certification**

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 handing 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.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
(Property Owner//Agent/Legal Representative)

Print/Type: \_\_\_\_\_  
(Property Owner/Agent/Legal Representative Name)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
(Consultant Completing Application Form)

Print/Type: \_\_\_\_\_  
(Consultant Completing Application Form)

# Notices to Applicants Regarding Federal and State PCBs Regulations

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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.

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## **Federal and State Regulations**

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.

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.

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## Agency Contacts

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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 <a href="mailto:armann.steve@epa.gov">armann.steve@epa.gov</a>	<a href="https://www.epa.gov/pcbs">https://www.epa.gov/pcbs</a> (EPA PCB website) <a href="https://www.epa.gov/pcbs/questions-and-answers-about-polychlorinated-biphenyls-pcbs-building-materials">https://www.epa.gov/pcbs/questions-and-answers-about-polychlorinated-biphenyls-pcbs-building-materials</a> (PCBs in Building Materials Fact Sheet and Q/A Document) <a href="https://www.epa.gov/pcbs/pcb-facility-approval-streamlining-toolbox-fast-streamlining-cleanup-approval-process">https://www.epa.gov/pcbs/pcb-facility-approval-streamlining-toolbox-fast-streamlining-cleanup-approval-process</a> (USEPA PCB Facility Approval Streamlining Toolbox (PCB FAST)) <a href="https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials#Test-Methods">https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials#Test-Methods</a> (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 <a href="mailto:Janet.O'Hara@waterboards.ca.gov">Janet.O'Hara@waterboards.ca.gov</a> Cheryl Prowell (510) 622-2408 <a href="mailto:Cheryl.Prowell@waterboards.ca.gov">Cheryl.Prowell@waterboards.ca.gov</a>	<a href="https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sfbaypcbstdml.shtml">https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sfbaypcbstdml.shtml</a> <a href="https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/sitecleanupprogram.html">https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/sitecleanupprogram.html</a>
Department of Toxic Substances Control	Regulatory Assistance Office 1-800-72TOXIC <a href="mailto:RAO@dtsc.ca.gov">RAO@dtsc.ca.gov</a>	<a href="http://www.dtsc.ca.gov/SiteCleanup/Brownfields/upload/PUB_SMP_Guide-to-Selecting-a-Consultant.pdf">http://www.dtsc.ca.gov/SiteCleanup/Brownfields/upload/PUB_SMP_Guide-to-Selecting-a-Consultant.pdf</a>
California Division of Occupational Safety and Health (known as Cal/OSHA)	CalOSHA Consultations Services 1-800-963-9424	<a href="https://www.dir.ca.gov/dosh/consultation.html">https://www.dir.ca.gov/dosh/consultation.html</a>