PCBs Screening Assessment Form
May 2023 Update (for MRP 3.0)

For Municipality Use Only	
Date Received	
File #	

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.**

Complete all applicable parts of the PCBs Screening Assessment Form and submit with your demolition permit application. See *"PCBs in Priority Building Materials: Model Screening Assessment Applicant Package, Applicant Instructions for Completing the PCBs Screening Assessment Form."*

All Applicants must complete Part 1 and Part 2.

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[1]		
Address		
City	State CA	Zip
APN (s)		
Year Building was Built	Type of Construction	
Estimated Demolition Date		

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

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 question 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 Question 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 entire building?	☐ Yes	☐ No
	➢ If the answer to Question 2.c is **No** the PCBs Screening Assessment is complete, skip to Part 4. ➢ If the answer is **Yes**, complete Part 3.		

The results of Part 2 determine whether the building is an Applicable Structure[1] (i.e., the answer to question 2.a is No and 2.b is Yes) and the proposed demolition is a complete demolition of the entire building, (i.e., the answer to question 2.c is Yes) and therefore the Applicant must complete Part 3 and the Part 3 tables (see below for these tables).

Part 3. Report concentrations of PCBs in priority building materials[2]

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.

Option 1. Conduct Representative Sampling. *Applicants conducted representative sampling and analysis of the priority building materials per the Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition (2018, revised November 2019) (Attachment C of the PCBs in Priority Building Materials: Model Screening Assessment Applicant Package).*

Option 2. Use Existing Sampling Records. *Applicants possess existing sample results that are consistent with the Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition (2018, revised November 2019) (Attachment C of the PCBs in Priority Building Materials: Model Screening Assessment Applicant Package).*

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.

☐ Option 1 Conduct Representative Sampling	☐ Option 2 Use Existing Sampling Records
□ Summarize results on Part 3 Tables; and provide the following supporting information (all three of the below types of documentation are required): □ Contractor's report documenting the assessment results; □ *QA/QC checklist (see Attachment C, section 3.2.4); and* □ Copies of the analytical data reports.	□ Summarize results on Part 3 Tables; and provide the following supporting information (both of below types of documentation are required): □ Contractor's report/statement documenting that the results are consistent with the *Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition.* □ Copies of the analytical data reports.

[1]An Applicable Structure is defined as a 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*.

[2]The Priority Building Materials are: 1. Caulk; 2. Thermal insulation; 3. Fiberglass insulation; 4. Adhesive mastics; and 5. Rubber window gaskets.

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.

I further certify that if the demolition site has an Applicable Structure[1] containing building materials with PCBs concentrations of 50 ppm or greater[2] at the time such structure undergoes demolition:

(1) I will notify the City of Menlo Park, 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.

(2) Additional notifications:

a. Within five working days after the demolition is complete, I will notify the City of Menlo Park of the actual demolition date(s).

b. Within five working days of it being determined, I will notify the City of Menlo Park whether advance approval from the U.S. EPA is required for this site.[3]

c. If it is determined[4] that advance approval from the U.S. EPA is not required for this site, I will submit the hazardous waste manifest for the disposal of PCBs materials to the City of Menlo Park within five working days of it becoming available. If advance approval from the U.S. EPA is required for this site, submittal of the hazardous waste manifest is not required.

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)

[1]Applicable 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*

[2]If 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.

[3]Provision 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.

[4]The Applicant makes this determination.

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	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/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 (Cal/OSHA)	CalOSHA Consultations Services 1-800-963-9424	https://www.dir.ca.gov/dosh/consultation.html

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*	
Caulk Application Sample Description	**Concentration (mg/kg)**	**Estimate Amount of Material**	**Units**
Example:			
Caulk Sample 1	*320*	*48*	*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*	
Fiberglass Insulation Application Sample Description	**Concentration (mg/kg)**	**Estimate Amount of Material**	**Units**
Example:			
Fiberglass Insulation Sample 1	*78*	*86*	*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□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*	
Thermal Insulation Application Sample Description	**Concentration (mg/kg)**	**Estimate Amount of Material**	**Units**
Example:			
Thermal Insulation Sample 1	*20*		*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□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*	
Adhesive Mastic Application Sample Description	**Concentration (mg/kg)**	**Estimate Amount of Material**	**Units**
Example:			
Adhesive Mastic Sample 1	*87.4*	*800*	*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

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*	
Rubber Window Gasket Application Sample Description	**Concentration (mg/kg)**	**Estimate Amount of Material**	**Units**
Example:			
Window Gasket Sample 1	*70*	*75*	*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 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*	
Material Sample Description	**Concentration (mg/kg)**	**Estimate Amount of Material**	**Units**
Example:			
Wall paint Sample 1	*228*	*1500*	*Square Feet*
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

Duplicate page if additional space is needed.