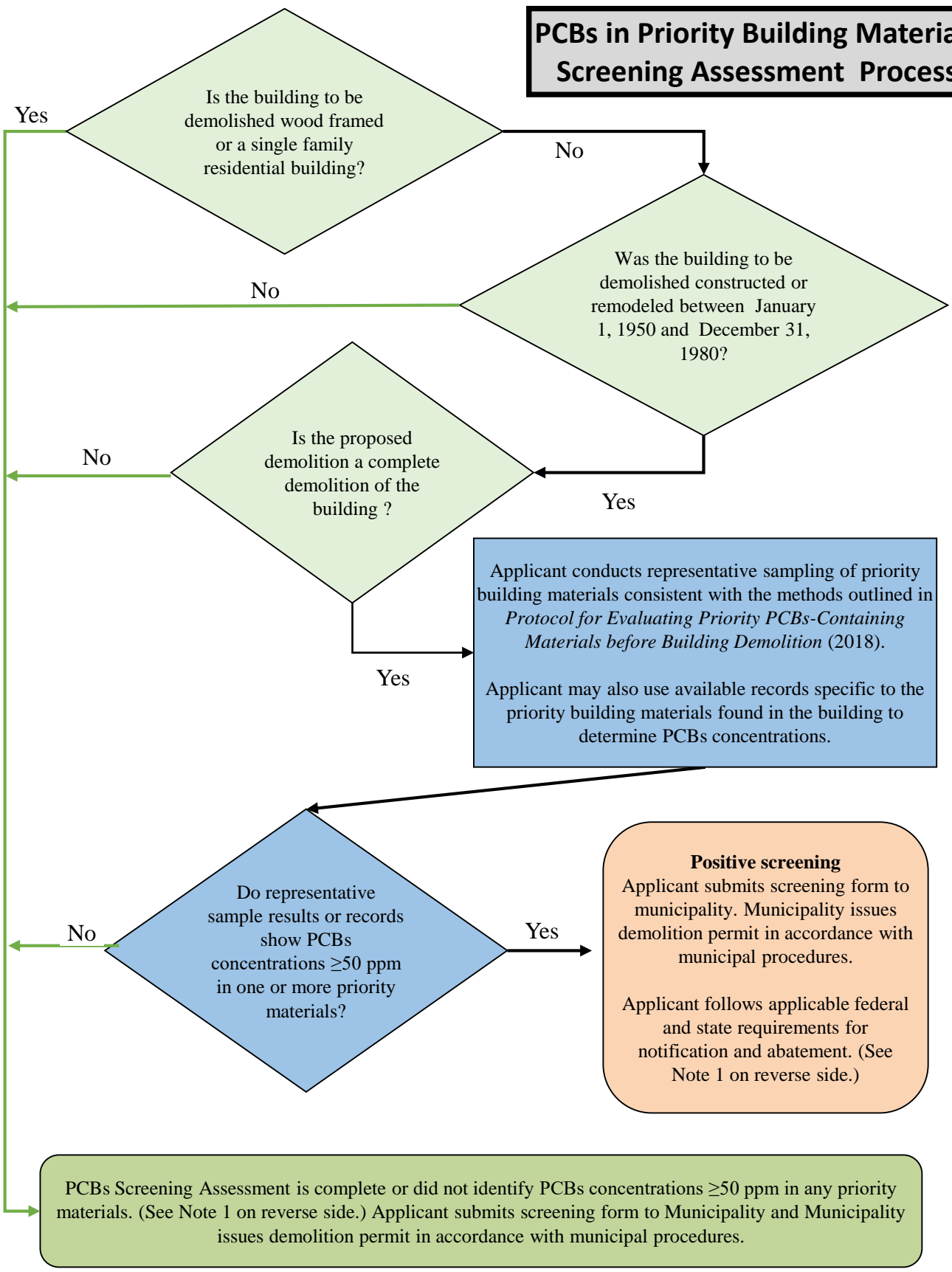


# **Attachment A**

## **Process Flow Chart**

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# PCBs in Priority Building Materials Screening Assessment Process



Applicant conducts representative sampling of priority building materials consistent with the methods outlined in *Protocol for Evaluating Priority PCBs-Containing Materials before Building Demolition (2018)*. Applicant may also use available records specific to the priority building materials found in the building to determine PCBs concentrations.

**Positive screening**  
Applicant submits screening form to municipality. Municipality issues demolition permit in accordance with municipal procedures.  
Applicant follows applicable federal and state requirements for notification and abatement. (See Note 1 on reverse side.)

PCBs Screening Assessment is complete or did not identify PCBs concentrations  $\geq 50$  ppm in any priority materials. (See Note 1 on reverse side.) Applicant submits screening form to Municipality and Municipality issues demolition permit in accordance with municipal procedures.

## Note 1

- ❖ 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 or 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 mg/kg.” There are circumstances in which materials containing PCBs below 50 mg/kg 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.