PCB INSPECTION CHECKLIST (REVISED FEBRUARY, 1999)

Name of Facility: _____

Address of Facility: _____

_____

I. PCB USE/REUSE (Regulatory threshold = 50 ppm PCB)

TRANSFORMERS (containing >3 lb of fluid)

1. Does the facility use or have in storage for reuse any PCB transformers or PCB contaminated transformers? _____Yes _____No

   If yes, complete table 1 and indicate below the total numbers.

   a. Total number of PCB transformers in service: _____

   b. Total number of PCB contaminated transformers in service: _____

   c. Total number of PCB transformers in storage for reuse: _____

   d. Total number of PCB contaminated transformers in storage for reuse: _____

2. Describe the basis of the facility's classification of its transformers (i.e., testing, name plate/label, service records, assumptions)

   _____

   _____

   If assumptions were made, were they in accordance with §761.2(a)(i.e., pre 7/79 or unknown date, mineral oil - PCB contaminated; pre 7/79 or unknown date, non-mineral oil - PCB)? _____Yes _____No

   761.30(a)(1)(i)

3. Are there any PCB transformers in use or in storage for reuse that pose an exposure risk to food or feed? _____Yes _____No

   If yes, describe:_____

_____

_____

_____

_____

_____

761.30(a)(1)(vi)(A)

4. Have all PCB transformers in use or in storage for reuse been registered with the EPA by December 28, 1998? _____Yes _____No

5. Have transformers which were identified as PCB transformers after December 28, 1998 been registered with EPA no later than 30 days after such identification was made? _____Yes _____No _____N/A

(If yes to either of the above, obtain a copy of the registration form and the return receipt signed by EPA. The facility must retain a copy of this material as required by §761.30(a)(1)(vi))(C))

6. Does the facility have any PCB transformers in or near commercial buildings? _____Yes _____No

(If no, skip to question 16)

7. Based on the facility's information, including electrical schematic diagrams, which of the following describes the type of transformers that are located in or near a commercial building?

   a. Network/Higher Secondary Voltage (480 volts) _____
   b. Network/Lower Secondary Voltage (<480 volts) _____
   c. Radial/Higher Secondary Voltage (480 volts) _____
   d. Radial/Lower Secondary Voltage (<480 volts) _____

(Note that a is prohibited (761.30(a)(1)(ii); b must be protected for high current faults; c must be protected for both high and low current faults; and d must be protected for high current faults(761.30(a)(1)(iv) & (v))

8. Describe below the type of enhanced electrical protection (i.e., current limiting fuses, circuit breakers, relays, etc.) that the facility has provided for its PCB transformers in or near commercial buildings.

_____

_____

_____

_____

761.30(a)(1)(vii)

9. Were PCB transformers located in or near a commercial building registered with the building(s) owner(s)? _____Yes _____No

(Note: PCB transformers located within a commercial building must be registered with the building owner of record while PCB transformers located near commercial buildings must be registered with all building owners located within 30 meters of the transformers)

10. Did registration occur by December 1, 1985? _____Yes _____No

If no, explain why:_____

_____

_____

761.30(a)(1)(xv)

11. For any transformer(s)located in or near commercial buildings assumed to contain less than 500 ppm of PCBs that were tested and found to contain 500 ppm or greater of PCBs, did the facility initiate the following:

a. register the transformer(s) with the building owner within thirty (30) days of discovery? _____Yes _____No _____N/A

If yes, is a copy of the registration letter available?
_____Yes _____No

(if yes, obtain a copy, if no, explain why)

_____

_____

b. install necessary protective equipment on radial or lower secondary voltage network transformers within 18 months of discovery or by Oct. 1, 1990, whichever is later? _____Yes _____No _____N/A

c. retrofill and reclassify or remove the above transformers within 18 months of discovery if enhanced electrical protection was not provided?
_____Yes _____No _____N/A

12. List each building (name and address) and building owner with whom registration occurred:

_____

_____

_____

_____

_____

13. Are copies of the registration letters available? ___Yes _____No

If yes, obtain copies

If no, explain why:

_____

_____

761.30(a)(l)(vii)

14. Did registration with the building owner(s) include provision of the following:

a. Specific location of PCB transformers? _____Yes _____No

b. Principal constituent of dielectric fluid? ____Yes _____No

c. Type of transformer installation? _____Yes _____No

761.30(a)(l)(iii)

15. Has the facility installed any PCB transformers which were placed in storage for reuse or which were moved from another location in or near commercial buildings since October 1, 1985? _____Yes _____No

If yes, list locations and dates of installations and volume of each PCB transformer installed:

_____

_____

_____

_____

761.30(a)(1)(viii)

16. Are any combustible materials stored within:

a. PCB transformer enclosure? _____Yes _____No

b. 5 (five) meters of a PCB transformer enclosure? _____Yes _____No

c. 5 (five) meters of an unenclosed PCB transformer? _____Yes _____No

If any are answered yes, take photographs and list the locations, type of situation, type of combustibles and any relevant comments:

_____

_____

_____

_____

761.30(a)(l)(ix)

17. Are visual inspections of each in use or stored for reuse PCB transformer for leaks performed at least once every three months since August 1981? _____Yes _____No

If no, indicate missing inspections:

_____

_____

_____

_____

761.30(a)(1)(xii)

18. Are inspection logs available? _____Yes _____No
If yes, obtain copies.

If no, explain why:_____

_____

_____

_____

761.30(a)(l)(x)

19. Have arrangements been made to repair or replace leaking (i.e. PCB oil running off or about to run off the external surface) PCB transformers?
_____N/A _____Yes _____No

If yes, describe arrangements:_____

_____

_____

_____

_____

If no, explain why:_____

_____

_____

_____

761.30(a)(1)(x)

20. Was clean-up of released PCBs resulting from a leaking PCB transformer initiated within 48 hours of its discovery? _____N/A _____Yes _____No

If no, explain why:_____

_____

_____

761.30(a)(1)(x)

21. Was an active leak of PCBs from a PCB transformer adequately contained after its discovery? _____N/A _____Yes _____No

761.30(a)(1)(x)

22. Are daily inspections performed of actively leaking PCB transformers to verify proper containment? _____N/A _____Yes _____No

761.30(a)(1)(xi)

23. Were any fire-related incidents involving a PCB transformer reported to the National Response Center? _____N/A _____Yes _____No

761.30(a)(l)(xii)

24. Are inspection logs maintained for these daily inspections?
_____N/A _____Yes _____No

If yes, obtain copies.

761.30(a)(1)(xii)

25. Are inspection and maintenance records maintained at least 3 years after disposal of the PCB transformer? _____N/A _____Yes _____No

761.30(a)(1)(xii)

26. Do inspection/maintenance records include:

a. Location of transformer? _____Yes _____No

b. Date of Inspection? _____Yes _____No

c. Date leak discovered? _____Yes _____No

d. Inspector's Name? _____Yes _____No

e. Location of Leaks? _____Yes _____No

f. Amount of dielectric fluid released? _____Yes _____No

g. Date(s) of cleanup, containment provision and leak repair? _____Yes _____No

761.30(a)(l)(xiii)

27. If annual inspections are performed of in use or stored for reuse PCB transformers:

a. Does adequate (i.e. 100%) secondary containment exist for these transformers? _____Yes _____No

Obtain dimensions.

b. Does evidence exist to demonstrate that testing of these transformers was performed and that they contained less than 60,000 ppm PCB after 3 months of in-service use? _____Yes _____No

If yes, obtain copies of test results.

761.30(a)(l)(xiv)

28. Were weekly inspections performed and records maintained at least 3 years where a PCB transformer in use or stored for reuse posed an exposure risk to food or feed prior to October 1, 1985?
_____N/A _____Yes _____No

761.30(a)(2)(i) and (ii)

29. Were any PCB transformers serviced as follows:

a. Dielectric fluid containing more than 500 ppm PCB was used?
_____N/A _____Yes _____No

b. Transformer coil was removed? _____N/A _____Yes _____No

c. Mixture of dielectric fluids, some of which contained more than 500 ppm PCB, was used? _____N/A _____Yes _____No

If any are answered **yes**, obtain copies of appropriate records that are available.

761.30(a)(2)(v)

30. If there was testing of a transformer(s) for reclassification purposes, did such testing occur after a minimum of 3 months of in-service use subsequent to last servicing and did temperature of dielectric fluid reach 50° C or more?
_____N/A _____Yes _____No

761.40(a)

31. Are all PCB transformers in use or in storage for reuse properly marked with a M_L label? _____Yes _____No

If no, describe circumstances:

_____

_____

_____

761.40(j)

32. Are all vault/room doors, fences, hallways or other accessways to PCB transformers properly marked with a M_L label? _____Yes _____No

If no, describe cases where M_L mark is missing and take photographs:

_____

_____

_____

_____

761.30(a)(l)(xv)

33. Does the facility have any mineral oil transformers assumed to contain less than 500 ppm of PCBs that were tested and found to contain 500 ppm or greater of PCBs? _____Yes _____No

If yes, has the facility initiated the following:

a. Marked the transformer(s)with a PCB M_L label within seven (7)days after discovery? _____Yes _____No

b. Marked the vault door, machinery room door, fence, hallway or other means of access to PCB transformers with a PCB M_L label within seven (7) days after discovery? _____Yes _____No

CAPACITORS (containing > 3 lb of fluid)

34. Does the facility use or have in storage for reuse any large PCB capacitors? _____Yes _____No

If yes, complete Table 2 and indicate below the total numbers:

a. Total number of PCB large high voltage capacitors in service: _____

b. Total number of PCB large low voltage capacitors in service: _____

c. Total number of PCB large high voltage capacitors in storage for reuse:_____

d. Total number of PCB large low voltage capacitors in storage for reuse:_____

35. Describe the basis of the facility's classification of its large capacitors (i.e., name plate/label, service records, assumptions)

_____

_____

_____

761.2(a)(4)

36. Has the facility assumed that any capacitor manufactured prior to July 2, 1979 or any capacitor whose date of manufacture is unknown and whose PCB concentration is not established contains 500 ppm PCB?
_____Yes _____No _____N/A

761.30(l)(1)(i)

37. After October 1, 1988, did the facility have any PCB Large High or Low Voltage Capacitors in use or in storage for reuse that pose an exposure risk to food or feed? _____Yes _____No

761.30(l)(1)(ii)

38. After October 1, 1988, did the facility have any PCB Large High or Low Voltage Capacitors in use in an area other than a restricted-access electrical substation or a contained and restricted-access indoor installation? _____Yes _____No

761.40(c)(2)(ii)

39. Are all PCB large high voltage capacitors individually marked with an M_L label unless they are installed in a protected location such as on a power pole, a structure, or behind a fence, in which case the pole, structure or fence must be properly labelled?
_____Yes _____No

If no, describe circumstances:

_____

_____

_____

_____

761.40(k)(1)

40. Are all PCB large low voltage capacitors individually marked with an M_L mark unless they are installed in a protected location such as on a power pole, structure, or behind a fence, in which case the pole structure or fence is labelled by April 26, 1999?
_____N/A _____Yes _____No

761.40(k)(2)

41. Is all equipment containing a PCB large high or low voltage capacitor labelled with an M_L mark by April 26, 1999?
_____N/A _____Yes _____No

VOLTAGE REGULATORS (containing >3 lb of fluid - regulations effective Aug. 28, 1998)

42. Does the facility use or have in storage for reuse any PCB voltage regulators that contain three (3) lbs or more of dielectric fluid?
_____Yes _____No

If yes, answer the following questions:

761.40(l)(1)

43. Are all PCB voltage regulators individually marked with an M_L label?
_____Yes _____No

761.40(l)(2)

44. Are locations of PCB voltage regulators such as vault doors, machinery room doors, fences, hallways or other means of access marked with an M_L label? _____Yes _____No _____N/A

761.30(h)(1)(ii)(B)

45. Are fire related incidents involving voltage regulators reported to the National Response Center? _____Yes _____No _____N/A

761.30(h)(1)(ii)(C)

46. Are inspections of PCB voltage regulators performed in a fashion similar to those required for PCB transformers (i.e., same frequency, scope, provisions when leaks occur, documentation, etc.)? _____Yes _____No

761.30(h)(1)(ii)(D)

47. Does facility owning PCB voltage regulators comply with the recordkeeping and reporting requirements applicable to PCB transformers (§761.180)?
_____Yes _____No

HEAT TRANSFER OR HYDRAULIC SYSTEMS

48. Does the facility have any heat transfer or hydraulic systems?
_____Yes _____No

If yes, answer the next question:

761.30(d) & (e)

49. Does heat transfer or hydraulic system(s)contain PCBs above 50 ppm?
_____Yes _____No

If yes, how many systems and what was the basis of determination:

_____

_____

_____

PCB CONTAMINATED POROUS SURFACES

50. Does the facility have a continued use of any PCB contaminated porous surface (porous surface includes concrete, wood, and coated metal surfaces; contaminated means >10 ug/100cm^2)? _____Yes _____No

If yes, answer the following questions:

761.30(p)(1)(i)

51. Was the source of PCB contamination removed or contained to prevent further release to the porous surface(s) in use? _____Yes _____No

761.30(p)(1)(ii)

52. Was the surface(s) properly cleaned if accessible?
_____Yes _____No _____N/A

761.30(p)(1)(iii)

53. Was the surface(s) properly coated and marked with an M_L label?
_____Yes _____No

Note: there are other authorized uses of PCB but they are not covered by this checklist

54. Does the facility store for reuse, in an area not meeting the requirements of §761.65 (Storage for Disposal), any PCB Article?
_____Yes _____No

If yes, answer the following questions:

761.35(a) & (b)

55. Has the facility stored for reuse any PCB Article for greater than 5 years after the date the Article was originally removed from service or 5 years after August 28, 1998, whichever is later, without written approval from EPA? _____Yes _____No

761.35(a)(1)

56. Has the facility complied with all use and marking requirements applicable to the PCB Articles in storage for reuse (see questions above pertaining to §761.30 and §761.40)? _____Yes _____No

761.35(a)(2)

57. Has the facility maintained records on its PCB Articles in storage for reuse which indicate when they were removed from use, the projected location and future use of the Articles and repair or servicing dates, if applicable? _____Yes _____No

Pertinent Comments:

_____

_____

_____

_____

_____

_____

_____

_____

_____

Transformer Observations

Table 1

Transformer Make, Ser#, Instal.	Type	Location	In Use	In Stor. for Reuse	Dielectric Fluid Name	PCB/PCB Contam.	M_L Affixed?	No Leak	Minor* Leak	Mod* Leak	Major* Leak

* Minor Leak - oil on outer surface but not about to run off
  Moderate Leak - oil about to run off of outer surface

Major Leak - oil running off article onto surface below
Take photographs of leak and collect sample if PCB concentration is unknown

Capacitor Observations

Table 2

PCB Capacitor Description/Voltage	Location	In Use	In Storage for Reuse	Dielectric Fluid Name/Volume/Wt.	M_L Label Affixed?	Leaking
					(Y) (N)	(Y)* (N)

_____
_____

_____
_____

_____
_____

* Take photographs of leak

II STORAGE FOR DISPOSAL (Regulatory threshold = 50 ppm)

(If PCB items are in storage for disposal, complete Table 3)

761.65(a)(1)

1. Were any PCB Articles, PCB Containers or other PCB items in storage for disposal for more than one (1) year from the date in which the item was removed from service for disposal? _____Yes _____No

761.65(a)(2)

If yes, did the facility obtain a one (1) year extension from EPA?
_____Yes _____No

761.65(b)(l)(i)

2. Does the storage facility have an adequate roof and walls to prevent rain water from reaching the stored PCBs or PCB Items? _____Yes _____No

761.65(b)(l)(ii)

3. Does the storage facility have an adequate floor with continuous curbing at least six inches high? _____Yes _____No

4. What are the dimensions of the curbed storage area?
_____Length _____Width _____Depth

5. List below the internal volume of the largest PCB Article or Container in the storage area (1) and the figure representing 25 percent of the total internal volume of all the PCB Articles or Containers in the storage area (2):

(1)_____

(2)_____

761.65(b)(1)(ii)

6. Does the floor and curbing provide a containment volume equal to at least two times the internal volume of the largest PCB Article or Container stored therein or 25 percent of the total internal volume of all the PCB Articles or Containers stored therein, whichever is greater?
_____Yes _____No

761.65(b)(l)(iii)

7. Are there any drain valves, floor drains, sewer lines, or other openings that would allow liquids to flow from the curbed storage area?
_____Yes _____No

If yes, describe which type of potential outlet is present.

_____

_____

_____

761.65(b)(l)(iv)

8. Are the storage area floor and curbing constructed of continuous smooth and impervious materials, such as Portland cement, concrete or steel, to prevent or minimize penetration of PCBs? _____Yes _____No

What material was used for construction of storage area?

_____

_____

_____

761.65(b)(l)(v)

9. Is the storage area located at a site that is below the 100-year flood water elevation? _____Yes _____No _____Unknown

If no, provide documentation that the storage area is above the 100-year flood water elevation. If unknown, obtain as much information as possible so that determination can be made in the Region.

761.65(c)(5)

10. Are PCB Articles and PCB Containers in storage for disposal checked for leaks at least once every 30 days? _____Yes _____No

761.65(c)(5)

11. Are records available which document when inspections of the storage facility are performed, by whom and the results of such inspections? _____Yes _____No

If yes, obtain copies

12. Are there any leaking PCB Articles or PCB containers in storage for disposal? _____Yes _____No

761.65(c)(5)

13. Have the contents of leaking PCB Articles or PCB Containers in storage for disposal been transferred to properly marked non-leaking containers? _____N/A _____Yes _____No

If no, explain why:

_____

_____

_____

_____

761.65(c)(5)

14. Have spilled or leaked materials from PCB Articles or PCB Containers in storage for disposal been immediately cleaned up using absorbents or other adequate means?
_____N/A _____Yes _____No

If no, explain why:

_____

_____

_____

_____

761.65(c)(6)

15. Are all containers used for the storage of liquid or non-liquid PCB waste in accordance with DOT regulations (49 CFR §171-180)?
_____N/A _____Yes _____No

761.65(c)(7)(ii)

16. Has an SPCC plan been prepared and implemented in cases where PCB liquids are stored in containers (incl. tanks) that are larger than those specified in the DOT regulations (i.e. 55 gal drums)?
_____N/A _____Yes _____No

761.65(c)(8)

17. Are PCB Articles and PCB Containers dated as to when they were placed in storage? _____Yes _____No

761.65(c)(8)

18. Is storage managed so that the PCB Articles and PCB Containers can be located by the date they entered storage? _____Yes _____No

761.65(c)(8)

19. Are records available which indicate the date and quantity of each batch of PCBs either added to or removed from large (> 55 gallon) containers in storage? _____N/A _____Yes _____No

20. Does the facility store any bulk PCB remediation waste or PCB bulk product waste at the clean-up site or site of generation?
_____Yes _____No

If yes, answer the following questions:

761.65(c)(9)

a. Has the waste been stored for 180 days or less?
_____Yes _____No

b. Is the waste placed in a pile designed and operated to control wind dispersion? _____Yes _____No

c. Does the waste generate leachate? _____Yes _____No

d. Is the storage site provided with a liner, a cover and a run-on control system? _____Yes _____No

761.40(a)(10)

21. Is each storage area and the PCB Items stored therein for disposal properly marked with a M_L label? _____Yes _____No

If no, describe items not properly marked:

_____

_____

_____

_____

22. Does the facility utilize a temporary storage area for PCB Items? _____Yes _____No

If yes, list types of PCB Items in temporary storage and answer the following questions:

_____

_____

_____

_____

761.65(c)(l)

23. Have any PCB Items been in temporary storage in excess of 30 days? _____Yes _____No

If yes, how much in excess of 30 days?

_____

761.65(c)(1)

24. Is there a notation on PCB Items in temporary storage indicating when the item was removed from service? _____Yes _____No

761.65(c)(l)(ii)

25. Are there any leaking PCB Articles or PCB Equipment in temporary storage which have not been placed in a non-leaking container that contains a sufficient amount of sorbent material? _____Yes _____No

761.65(c)(l)(iv)

26. Has an SPCC plan been prepared for a temporary storage area where PCB Containers containing liquid PCBs at a concentration 50ppm are being stored? _____N/A _____Yes _____No

761.65(c)(1)(iv)

27. Are PCB containers containing liquid PCBs at a concentration 50 ppm in temporary storage authorized by DOT regulations (49 CFR §171-180)? _____N/A _____Yes _____No

761.65(c)(3)

28. Is the temporary storage area properly marked with an M_L label? _____Yes _____No

29. Does the facility store any PCB items on pallets next to a designated storage area? _____Yes _____No

If yes, list PCB Items stored at that location:

_____

_____

_____

_____

_____

761.65(c)(2)

30. Does the storage facility have immediately available unfilled storage equal to 10 percent of the volume of PCB large, high voltage capacitors and PCB contaminated electrical equipment stored outside the facility? _____Yes _____No

761.65(c)(2)

31. Are the capacitors or other electrical equipment stored outside the facility checked for leaks at least weekly? _____Yes _____No

32. Is the facility a commercial storage facility (i.e., accepts PCB wastes from other facilities)? _____Yes _____No

If yes, answer the following:

761.65(d)(1) & (2)

a. Has the facility received final approval from EPA to operate as a commercial storage facility? _____Yes _____No

If yes, obtain evidence, including proof that it has met financial responsibility requirements and has an acceptable closure plan.

Pertinent Comments:_____

_____

_____

_____

_____

PCB ITEMS IN STORAGE FOR DISPOSAL (50 ppm)

Table 3

ITEM DESCRIPTION	*ITEM DATED? (Y) (N)*	*RECORD DATE*	*PCB M_L LABEL? (Y) (N)*	*ITEM LEAKING? (Y) (N)*	*REMARKS*

ITEM DESCRIPTION	*ITEM DATED? (Y) (N)*	*RECORD DATE*	*PCB M_L LABEL? (Y) (N)*	*ITEM LEAKING? (Y) (N)*	*REMARKS*

III. PCB WASTE PROCESSING (EXCLUDING STORAGE), CLEAN-UP AND DISPOSAL
(Regulatory threshold = 50 ppm)

1. Is the facility a commercial facility (i.e., accepts PCB wastes from other facilities)?
_____Yes _____No

If yes, is it permitted by EPA? _____Yes _____No

761.60(b)(1)(i)(B) & (b)(4)

2. Has the facility removed all free-flowing liquid from its PCB and PCB contaminated transformers through the use of a solvent for at least 18 continuous hours? _____Yes _____No _____N/A

761.60(b)(6)(i) & (ii)

3. Has the facility removed all free-flowing liquid from its other PCB and PCB contaminated articles?
_____Yes _____No _____N/A

761.1(a)(5)

4. Does it appear as though the facility is diluting any of its PCB waste prior to disposal?
_____Yes _____No _____N/A

5. Check which of the following types of PCB waste the facility handles (state whether waste is cleaned up/decontaminated, processed, or disposed of):

a. PCB liquids _____

b. PCB transformers _____

C. PCB capacitors _____

d. Other PCB Articles _____

e. PCB Contaminated Equipment _____

f. PCB Containers _____

g. PCB Remediation Waste* (describe types & concentrations)

_____

_____

h. PCB Bulk Product Waste** _____

_____

i. R & D Related PCB Waste _____

j. PCB/Radioactive Waste _____

k. Other (describe) _____

* - means waste containing PCB as a result of a spill, release, or other unauthorized disposal. It includes bulk PCB remediation waste (i.e., soil, sediment, sludge), non-porous surfaces, porous surfaces, and liquids

** - means waste derived from manufactured products containing PCBs in a non-liquid state. It includes demolition debris, material from shredding operations (i.e., fluff), coatings, insulation and fluorescent light ballasts containing PCB contaminated potting material

6. Is the facility involved with clean-up/decontamination of any PCB remediation waste?
_____Yes _____No

If yes, for each specific type of PCB remediation waste, describe its PCB concentration, the clean-up procedure employed and the level of clean-up achieved (state if it's self-implementing).

_____

_____

_____

_____

_____

_____

7. Does the facility perform decontamination activities on any PCB waste materials, other than PCB remediation waste, including water, organic liquids, non-porous surfaces (either coated or uncoated) or concrete? _____Yes _____No

If yes, describe the PCB concentration of the waste, decontamination procedure employed and the level of decontamination achieved (state if it's self implementing).

_____

_____

_____

_____

_____

_____

_____

8. For each PCB waste identified in question 5 as being disposed of at the facility, indicate below its PCB concentration and the method and location of its disposal.

_____

_____

_____

_____

_____

_____

9. For any mixed media or multi-phase waste, does the facility use the media having the highest PCB concentration to determine the appropriate method of disposal? _____Yes _____No _____N/A

761.50(a)

10. Indicate below if any of the following disposal prohibitions were observed at the facility?

a. open burning of PCBs _____

b. discharging of PCB contaminated water (3 ug/l) to treatment works or navigable streams _____

c. processing liquid PCBs into non-liquid forms _____

d. spills or other uncontrolled discharges _____

761.60

11. Describe below any other disposal of PCB items that was not in accordance with the following disposal matrix.

_____

_____

_____

PCB DISPOSAL METHODS

Type of Waste	Incin-erator	High Effic-iency Boiler	Indus-trial Furnace	Chemical Waste Landfill	Approved Hazard. Waste Landfill	Permitted Solid Waste Facility	Approved Disposal Facility	RA Approved Self-Imple-menting Procedure
PCB Liquids (>500 ppm)	X							
PCB Liquids (50-500 ppm)	X	X						
Drained PCB Containers/Articles	X			X				
Drained PCB Contaminated Articles/Containers			X			X	X	

Large Undrained PCB Capacitors	X			X (under certain condi-tions				
PCB Remediation Waste - Liquid (not decontaminated)	X	X (<500 ppm)						X
PCB Remediation Waste - Non-Liquid (not decontaminated)	X			X				X
Non-Liquid PCB-Bulk Product Waste	X			X	X	X		X
Non-Liquid PCB-Soil, Rags, Debris	X			X				
Non-Liquid PCB-Sludges, Sediment	X			X				X

Other Pertinent Comments

_____

_____

_____

_____

_____

IV. RECORDKEEPING AND REPORTS RELATED TO USE, STORAGE AND DISPOSAL OF PCB

Note: If the facility is a disposer or commercial storer of PCB waste skip to question 12

761.180(a)

1. Does the facility have in use, or in storage for future use or disposal, the following:

a. 99.4 lbs. (45 kg.) or more of PCBs in PCB Container(s)?
_____Yes _____No

b. One or more PCB Transformers? _____Yes _____No

c. 50 or more large high or low voltage PCB capacitors?
_____Yes _____No

761.180(a)

2. Has the facility developed and maintained all annual records and the annual document log as of July 1, 1991, and each year thereafter? _____Yes _____No

a. Are the annual records and the annual document log prepared on a calendar year basis? _____Yes _____No

b. Has the facility retained the annual records and the annual document logs for at least three (3) years after it no longer used or stored PCBs or PCB Items?
_____Yes _____No

3. Where are the records maintained?_____

_____

a. How are the records compiled and by whom?_____

_____

_____

761.180(a)(l)(i),(ii) & (iii)

4. Do the facility's annual records contain the following:

a. All signed manifests generated by the facility during the calendar year? _____Yes _____No

b. All Certificates of Disposal that have been received by the facility during the calendar year? _____Yes _____No

c. Records of inspections and clean-ups? _____Yes _____No

761.180(a)(2)(i) & (ii)

5. Does the written annual document log contain the following:

a. The name, address, and EPA identification number of the facility? _____Yes _____No

b. The calendar year covered by the annual document log? _____Yes _____No

c. The unique manifest number of every manifest generated by the facility during the calendar year? _____Yes _____No

6. Does the written annual document log contain the following information from each manifest and for unmanifested waste that may be stored at the facility:

761.180(a)(2)(ii)(A)

Bulk PCB waste (e.g. in a tanker or truck) _____N/A

a. Its weight in kilograms? _____Yes _____No

b. The first date it was removed from service for disposal? _____Yes _____No

c. The date it was placed into transport for off-site storage or disposal? _____Yes _____No

d. The date of disposal, if known? _____Yes _____No

761.180(a)(2)(ii)(B)

PCB Articles (e.g. transformer or capacitor) _____N/A

a. The serial number (if available) or other means of identifying each PCB Article? _____Yes _____No

b. The weight in kilograms of the PCB waste in each PCB Article? _____Yes _____No

c. The date it was removed from service for disposal?
_____Yes _____No

d. The date it was placed in transport for off-site storage or disposal?
_____Yes _____No

e. The date of disposal, if known? _____Yes _____No

761.180(a)(2)(ii)(C)

PCB Containers _____N/A

a. A unique number identifying each PCB Container?
_____Yes _____No

b. A description of the contents of each PCB Container?
_____Yes _____No

c. The total weight in kilograms of the material in each PCB Container?
_____Yes _____No

d. The first date material was placed in each PCB Container? _____Yes _____No

e. The date each container was placed in transport for off-site storage or disposal? _____Yes _____No

f. The date of disposal, if known? _____Yes _____No

761.180(a)(2)(ii)(D)

PCB Article Containers _____N/A

a. A unique number identifying each PCB Article Container?
_____Yes _____No

b. A description of the contents of each PCB Article Container? _____Yes _____No

c. The total weight in kilograms of the contents of each PCB Article Container? _____Yes _____No

d. The first date a PCB Article was placed into each container? _____Yes _____No

e. The date the container was placed in transport for off-site storage or disposal? _____Yes _____No

f. The date of disposal, if known? _____Yes _____No

761.180(a)(2)(iii)

7. Does the facility's annual document log contain the total numbers and total weights (kg.) for the following items:

a. Total number of PCB Articles (by specific type)?
_____Yes _____No _____N/A

b. Total weight of PCBs in PCB Articles?
_____Yes _____No _____N/A

c. Total number of PCB Article Containers?
_____Yes _____No _____N/A

d. Total weight of contents of PCB Article Containers?

_____Yes _____No _____N/A

e. Total number of PCB Containers? _____Yes _____No _____N/A

f. Total weight of contents of PCB Containers?
_____Yes _____No _____N/A

g. Total weight of bulk PCB waste that was placed into storage for disposal or disposed during the calendar year? _____Yes _____No _____N/A

761.180(a)(2)(iv), (v) & (vi)

8. For PCBs and PCB Items remaining in service at the end of the calendar year, do records indicate the following:

a. Total number of PCB Transformers?
_____Yes _____No _____N/A

b. Total weight (kg) of PCBs in transformers?
_____Yes _____No _____N/A

c. Total number of large high or low voltage PCB Capacitors? _____Yes _____No _____N/A

d. Total weight (kg) of PCBs and PCB Items in PCB Containers? _____Yes _____No _____N/A

e. Identification of contents of PCB containers (liquids, capacitors, etc.)? _____Yes _____No _____N/A

761.180(a)(2)(vii)

9. For any PCBs or PCB Items received from or shipped to another facility owned or operated by the same generator, does the annual document log contain the same information as asked in Question No. 6?

_____Yes _____No _____N/A

761.180(a)(2)(viii)

10. Does the facility's annual document log contain a record of each telephone call (or other means of verification) made to each commercial storer or disposer to confirm receipt of PCB waste transported by an independent transporter?

_____Yes _____No _____N/A

761.180(a)(2)(ix)

11. Does the facility's annual document log contain the name, address and telephone number of the person to whom a PCB item containing >50ppm PCB, excluding small capacitors, has been distributed in commerce for reuse along with date of transfer and the serial or internal identification number of the item? _____Yes _____No _____N/A

Skip to next section of checklist

Questions for Disposer ( )/Commercial Storer ( ) Facilities (check appropriate type)

12. Has the facility developed and maintained all annual records and the annual document log as of July 1, 1991, and each year thereafter? _____Yes _____No

a. Are the annual records and the annual document log prepared on a calendar year basis? _____Yes _____No

b. Has the facility retained the annual records and the annual document logs for at least three (3) years after it no longer used or stored PCBs or PCB Items?

_____Yes _____No

c. Has the facility prepared and submitted to the EPA Regional Administrator annual reports by July 15th for each preceding calendar year?
_____Yes _____No

13. Where are the records maintained?_____

_____

a. How are the records compiled and by whom?_____

_____

_____

761.180(b)(l)(i) & (ii)
14. Do the facility's annual records contain the following:

a. All signed manifests generated or received by the facility during the calendar year? _____Yes _____No

b. All Certificates of Disposal that have been generated or received by the facility during the calendar year?
_____Yes _____No

c. Records of inspections and clean-ups? _____Yes _____No

761.180(b)(2)(i) & (ii)
15. Does the written annual document log contain the following:

a. The name, address, and EPA identification number of the facility?
_____Yes _____No

b. The calendar year covered by the annual document log?

_____Yes _____No

c. The unique manifest number of every manifest generated or received by the facility during the calendar year and the name and address of the generator?
_____Yes _____No

761.180(b)(2)(ii)(A)

16. Does the written annual document log contain the following information from each manifest and for unmanifested waste that may be stored or disposed of at the facility:

Bulk PCB waste (e.g. in a tanker or truck) _____N/A

a. Its weight in kilograms? _____Yes _____No

b. The first date it was removed from service for disposal?
_____Yes _____No

c. The date it was received at the facility? _____Yes _____No

d. The date it was placed into transport for off-site storage or disposal? _____Yes _____No

e. The date of disposal, if known? _____Yes _____No

761.180(b)(2)(ii)(B)

PCB Articles (e.g. transformer or capacitor) _____N/A

a. The serial number (if available) or other means of identifying each PCB Article (not in a PCB Container or PCB Article Container)?
_____Yes _____No

b. The weight in kilograms of the PCB waste in each PCB Article? _____Yes _____No

c. The date it was removed from service for disposal?
_____Yes _____No

d. The date it was received at the facility? _____Yes _____No

e. The date it was placed in transport for off-site storage or disposal? _____Yes _____No

f. The date of disposal, if known? _____Yes _____No

761.180(b)(2)(ii)(C)

PCB Containers _____N/A

a. A unique number identifying each PCB Container?
_____Yes _____No

b. A description of the contents of each PCB Container?
_____Yes _____No

c. The total weight in kilograms of the material in each PCB Container? _____Yes _____No

d. The first date material (PCB Waste) placed in each PCB Container was removed from service for disposal? _____Yes _____No

e. The date it was received at the facility? _____Yes _____No

f. The date each container was placed in transport for off-site storage or disposal? _____Yes _____No

g. The date of disposal, if known? _____Yes _____No

761.180(b)(2)(ii)(D)

PCB Article Containers _____N/A

a. A unique number identifying each PCB Article Container?
_____Yes _____No

b. A description of the contents of each PCB Article Container? _____Yes _____No

c. The total weight in kilograms of the contents (PCB Waste)of each PCB Article Container? _____Yes _____No

d. The first date a PCB Article placed into each container was removed from service for disposal? _____Yes _____No

e. The date it was received at the facility? _____Yes _____No

f. The date the container was placed in transport for off-site storage or disposal? _____Yes _____No

g. The date of disposal, if known? _____Yes _____No

17. Does the facility use EPA's "PCB VOLUNTARY FORM FOR THE ANNUAL REPORT" to document the annual report? _____Yes _____No

761.180(b)(3)(i) & (ii)

18. Does the facility's annual report contain the following information:

a. The name, address, and EPA identification number of the facility? _____Yes _____No

b. A list of the numbers of all signed manifests of PCB waste initiated or received by the facility during the calendar year? _____Yes _____No

761.180(b) (3) (iii), (iv), (v), & (vi)

19. Does the facility's annual report include the total weights and total numbers, by PCB waste type (bulk, transformers, capacitors, article containers, and containers) in each of the following categories:

a. In storage at the facility at the beginning of the calendar year? _____Yes _____No

b. Received or generated at the facility during the calendar year? _____Yes _____No

c. Transferred to another facility during the calendar year?
_____Yes _____No

d. Disposed of at the facility during the calendar year?
_____Yes _____No

e. Remaining in storage for disposal at the facility at the end of the calendar year? _____Yes _____No

(Refer to EPA's "PCB Voluntary Form For The Annual Report" as a guide to answering this question)

Pertinent Comments

SUBPART K - PCB WASTE DISPOSAL RECORDS AND REPORTS
(40 CFR Part 761.202-761.218)

761.205(c)(2)

20. Is the facility exempt from the EPA notification requirements because it is only a generator of PCB waste through its use, owning, servicing or processing of PCBs or PCB items but does not own or operate a designated storage for disposal area subject to the requirements of §761.65(b) or §761.65(c)(7)? _____Yes _____No

If yes, skip to question 25c

761.202(c)

21. Has the facility engaged in PCB waste handling activities on or prior to February 5, 1990?
_____Yes _____No

761.202

22. Has the facility applied for an EPA identification number?
_____Yes _____No

If yes, what was the date of the application and has the ID number been officially issued?
_____

_____

_____

If no, does the facility already have a RCRA identification number?
_____Yes _____No

761.205(b)
If the facility has a RCRA ID number, did it notify EPA of its PCB waste activities by April 4, 1990?
_____Yes _____No

761.205(c)(2)(iii)
23. Has the generator submitted separate notifications to EPA for each PCB storage area it owns or operates on different sites or properties? _____Yes _____No _____N/A

761.205(f)
24. Has the facility resubmitted a notification form within 30 days from the time that its waste handling activities changed?
_____Yes _____No _____N/A

25. If the facility did not engage in PCB waste activities until after February 5, 1990 and has not yet received an EPA identification number or if the facility engaged in PCB waste activities on or before February 5, 1990 but has not applied for an EPA identification number have any of the following occurred:

761.202(b)(c)&(d)

a. The facility is a generator of PCB waste and processed, stored, transported or offered for transport or disposed of such PCB waste after June 4, 1990? _____Yes _____No

761.202(b)(c)&(d)

b. The facility is not a generator of PCB waste but has engaged in transporting, commercial storage or disposal of such PCB waste after June 4, 1990? _____Yes _____No

761.202(b)(c)&)d)

c. The facility is a generator that offered PCB waste to transporters, commercial storers, or disposers who have not received an EPA identification number? _____Yes _____No

761.202(b)(c)&(d)

d. The facility is not a generator of PCB waste but has delivered such waste to a transporter, commercial storer or a disposer that have not received an EPA identification number? _____Yes _____No

761.207(a)

26. Has the generator prepared a manifest whenever it ships PCB waste, including drained PCB contaminated transformers off-site?

_____Yes _____No _____N/A

If No or N/A skip to question 33

761.207(a)

27. Was the manifest prepared on EPA Form 8700-22 with a continuation sheet if necessary?

_____Yes _____No

If no, describe what manifest was used.

_____

_____

_____

28. Was the following information specified on the manifest

761.207(a)(1)

a. For each bulk load of PCBs, its identification, the earliest date of removal from service for disposal and its weight in kilograms?

_____Yes _____No _____N/A

761.207(a)(2)

b. For each PCB container or article container, an identification number, type of PCB waste, earliest date of removal from service for disposal and its weight in kilograms?

_____Yes _____No _____N/A

761.207(a)(3)

c. For each PCB article, its serial number or other identification, date of removal from service for disposal and weight in kilograms of its PCB waste? _____Yes _____No _____N/A

761.207(g)

d. An approved off-site commercial storage or disposal facility for PCB waste? _____Yes _____No

761.209(a)

29. Did the generator of PCB waste, transporter or the storage or disposal facility retain on file copies of the appropriate manifests?

_____Yes _____No

761.209(a)

30. Were the manifests properly signed? _____yes _____no

761.208(a)(4)

31. Did the generator receive the hand signed manifest within 35 days after the PCB waste was accepted by the transporter?

_____Yes _____No _____N/A

761.208(a)(4)

If yes, did the generator confirm by telephone or other means (if shipped by an independent transporter) within a day after receiving the hand-signed manifest that the commercial storer or disposer actually received the manifested waste? _____Yes _____No _____N/A

761.208(a)(4)

If no, did the generator telephone or communicate by other means first with the commercial storer or disposer and then, if necessary, with the transporter to determine the status of the PCB waste?

_____Yes _____No _____N/A

761.208(a)(4)

32. If the generator has not received a hand-signed manifest from an EPA approved facility within 10 days from the date of the telephone call to the transporter, did it submit an exception report to the EPA Regional Administrator? _____Yes _____No _____N/A

761.211(a)

33. Is there evidence to indicate that either a transporter or a commercial storer or disposer accepted a shipment of PCB waste after April 4, 1990 without a properly signed manifest?

_____Yes _____No _____N/A

761.211(c)

If yes, describe and state whether an "Unmanifested Waste Report" was submitted to the EPA Regional Administrator within 15 days after the unmanifested PCB waste was received.

_____

_____

_____

_____

761.210(a)

34. Is there evidence to indicate that a significant discrepancy regarding the amount of PCB waste stated on the manifest occurred?

_____Yes _____No _____N/A

761.210(b)

If yes, describe the discrepancy and attempts to reconcile it, and state whether a letter was submitted to the EPA Regional Administrator if it is was not resolved within 15 days after the PCB waste was received

_____

_____

_____

_____

_____

Answer questions 35 and 36 if the facility is a disposer of PCB waste

761.215(c)(1)&(2)

35. Does the disposer submit to the EPA Regional Administer, no later than 45 days from the end of the one (1) year storage for disposal date a One-year Exception Report if it receives PCB or PCB items more than 9 months after they were removed from service for disposal and, it

could not dispose of the affected PCBs or PCB items within 1 year of the date of removal from service for disposal? _____Yes _____No

761.218(a)&(b)

36. Does the disposer prepare a Certificate of Disposal for each shipment of PCB waste that it accepts and does it send a copy to the generator identified on the manifest within 30 days of the date that disposal of the PCB waste was completed? _____Yes _____No

Answer question 37 if the facility is a generator or commercial storer of PCB waste

761.215(d)(1)&(2)

37. Does the generator or commercial storer submit to the EPA Regional Administrator, no later than 45 days, a One-year Exception Report if it transferred PCB or PCB items to the disposer within 9 months after they were removed from service for disposal and it either has not received, within 13 months after removal from service for disposal, a Certificate of Disposal confirming the disposal of the affected PCBs or PCB items or it receives a Certificate of Disposal confirming disposal more than 1 year after the date of removal from service? _____Yes _____No

Pertinent Comments

_____

_____

_____

Addendum to PCB Checklist

The following items are not addressed in the checklists but, if the situation warrants, they should be addressed in the inspection report.

761.20(a)

1. Were any PCBs being used in other than a totally enclosed manner?

761.20(b)

2. Were PCBs being manufactured without an exception?

761.20(c)

3. Were PCBs being processed or distributed in commerce without an exception?

4. Does the facility have any waste oil? If so, collect a sample of it for PCB analysis. Also, determine whether any waste oil containing detectable concentrations of PCBs are being used as a sealant, coating or dust control agent.

5. If the facility used PCBs in a hydraulic or heat transfer system, collect samples of sludges from drainage systems near the hydraulic or heat transfer system.

6. If there were any spills or uncontrolled discharges of PCBs in excess of 50 ppm at the facility were they cleaned up in accordance with spill cleanup policy contained in 40 CFR 761.125?