

Rutgers Environmental Health and Safety

PCB Self-Audit (TSCA Program)

Facility Name: Rutgers University, _____ Campus/Farm/Field Station (circle one)

Facility Address: _____

Facility EPA Identification Number: _____

Date of Self-Audit Inspection: _____

Section I. Administrative Review

Name/Title of Facility Contact: _____

1. yes no This facility maintains an inventory of PCB items (50 ppm or greater PCB) such as transformers, oil, ballasts, or other sources of PCB?

2. If yes, identify all types of PCB items: _____

Generators, transporters and disposers of PCB waste are required to have a US EPA identification number (40CFR 761.202 through 761.205).

3. This location is a PCB: generator disposer (circle all that apply)
 transporter commercial storer

comments: _____

4. yes no Rutgers University has notified the EPA of its PCB waste handling activities by using the notification form required under 761.205 (Form 7710-53).

comments: _____

5. yes no This facility is exempt from filing the notification form 7710-53 (40 CFR 761.205 (c)(1)(2)).

comments: _____

Section II. General Management

It is required that PCB concentrations of equipment be established by certain methods (40CFR 761.1(b)(4) and 761.2(b)).

At this facility, have PCB concentrations of equipment been established using of the following techniques:

- 1. yes no Testing the equipment.

- 2. yes no Permanent label, mark, or other documentation from the manufacturer of the equipment indicating its PCB concentration at the time of manufacture.

- 3. yes no Service records or other documentation indicating PCB concentration of all fluids used in servicing the equipment since it was first manufactured.

comments: _____

Section III. Transformers: PCB contaminated and PCB

PCB transformers with concentrations of 500 ppm or greater are subject to certain registration requirements (40 CFR 761.30(a)(1)(vi)).

- 1. yes no Rutgers University currently has PCB transformers on site with concentrations of PCB 500 ppm or greater. If no, proceed to Section III. If yes, proceed to the next question.

- 2. yes no PCB transformers on site or in storage are currently registered with the US EPA, National Program Chemicals Division, Office of Pollution Prevention and Toxics with the following information:

- 3. yes no Registration with the US EPA includes the name and address of the facility.

- 4. yes no Registration with the US EPA includes the contact name and telephone number.

- 5. yes no Registration with the US EPA includes the address where transformers are located.

- 6. yes no Registration with the US EPA includes the number of PCB transformers and total weight in kg of PCB contained in the transformer(s).

- 7. yes no Registration with the US EPA includes the signature of the owner, operator , or other authorized representative certifying the accuracy of the information submitted.
- 8. yes no PCB transformers are registered with the appropriate local fire departments.

Inspections every three months must be performed for all in use or stored for reuse PCB transformers with >500ppm (40CFR 761.30(a)(1)(ix) and 761.30(a)(1)(xii) through 761.30(a)(1)(xiv)).

- 9. yes no Every three months, inspections are performed and completed for any PCB transformers on site.
- 10. yes no Each inspection includes the location of the transformer.
- 11. yes no Each inspection includes the date of each visual inspection.
- 12. yes no Each inspection includes the date when any leak was discovered.
- 13. yes no Each inspection includes the name of person conducting inspection.
- 14. yes no Each inspection includes the location and estimate of the fluid quantity for any leaks.
- 15. yes no Each inspection includes the date and description of any cleanup or repair performed.
- 16. yes no Each inspection includes the registration of the PCB transformer.
- 17. yes no PCB label is affixed to the door which gives access to the transformer(s) as well as the transformer(s) itself.
- 18. yes no Records of inspections and maintenance are being maintained for PCB transformers.
- 19. yes no Records are maintained for disposal of PCB transformers.

comments: _____

Section IV. PCB Storage (Storage Facility - Environmental Services Building)

PCB wastes at concentrations of 50 ppm or more that are stored before disposal must be stored in a facility that meets specific structural requirements (40 CFR 761.65(a) through 761.65(b)(1).

The Environmental Services Building meets the following provisions:

1. yes no The roof and walls of the building in which PCBs are stored are constructed so as to exclude rainwater from contacting the PCBs.
2. yes no The floor has continuous curbing with a minimum 6 inches high curb. The curbing will provide a containment volume equal to at least two times the internal volume the largest PCB article or container or 25% of the total internal volume of all PCB articles or containers stored there, whichever is greater.
3. yes no Drains, valves, floor drains or other openings that would allow liquids to flow from the curbed area (cell#7) are not present.
4. yes no Floors and curbing are constructed of concrete or other continuous, smooth, non-porous surface that prevents or minimizes penetration of PCB.
5. yes no Location of the storage facility is not below a 100yr. flood water elevation.
6. yes no The storage area is marked with the PCB label.
7. yes no All PCB waste is removed from storage within 9 months of the out of service date (date it was determined as waste).
8. yes no All PCB waste is disposed of within 1 year of the out of service date.
9. yes no If question 8 was answered 'no,' a written notification to the Regional Administrator for Region II was made to identify an unsuccessful attempt to dispose of the material.

Specific operational procedures are required at PCB storage areas. (40CFR 761.65(c)(1) through 40CFR 761.65(c)(9).

10. yes no Inspections for leaks of all PCB items in storage are done at least once every 30 days.
11. yes no All PCB items are marked with the date when they are removed from service for disposal.
12. yes no All PCB items in storage are positioned so that they can be located by the marked date.

Containers used for the storage of PCB must comply with the shipping specifications of the DOT (40 CFR 761.65 (c)(6) and 761.65 (c)(7)).

- 13. yes no All containers used for the storage of liquid or non-liquid PCB waste is in accordance with the DOT Hazardous Materials Regulations.

comments: _____

Section V. Additional storage requirements

- 1. yes no PCB wastes are assigned a unique number and out of service date while in storage.
- 2. yes no The storage area within the Environmental Services Building (cell#7) is properly marked with PCB mark.
- 3. yes no Doors to the chemical storage room are marked with the PCB mark.
- 4. yes no All PCB waste items stored are within secondary containment and /or stored on spill pallets in cell # 7.
- 5. yes no All PCB items in storage (50ppm or greater) are marked individually as PCB and positioned so they can be identified by the out of service date?

comments: _____

Section VI. Transportation

Preparation of manifests (40 CFR 761.207, 761.208(a) and 761.209(a)).

- 1. yes no *Manifests identify and declare PCB waste*
- 2. yes no Manifests have been completed for all PCB shipments.
- 3. yes no Manifests include the identity of the waste.
- 4. yes no Manifests include the date of removal from service for disposal.
- 5. yes no Manifests include the unique number ID number for the PCB item.
- 6. yes no Manifests include the weight of PCB in kilograms.

- 7. yes no Manifests include the signature by generator, transporter, and disposal facility (copy #3 only)
- 8. yes no All PCB waste manifests are properly filed and maintained in manifest books.
- 9. yes no All PCB waste manifests are complete(copy 3 and copy 8 of the manifest).

comments: _____

Section VII. Disposal

For each shipment of PCB waste that a disposal facility accepts, a certificate of disposal (COD) must be prepared for the PCB items disposed of. (40 CFR 761.218).

- 1. yes no The CODs that have been sent to us contain the identity of the disposal facility by name, address, and EPA ID number.
- 2. yes no The CODs which have been sent to us contain the identity of the PCB waste affected by the COD including reference to the manifest number for the shipment.
- 3. yes no The CODs which have been sent to us contain statement certifying the fact of disposal of the identified PCB waste, including date of disposal, and the process used.
- 4. yes no The CODs that have been sent to us contain certification as defined in 40 CFR 761.3.
- 5. yes no All CODs from PCB waste shipments at Rutgers University are maintained on file with the manifests.
- 6. yes no All CODs for PCB are received within 30 days of the date of disposal and within one year of the shipment date.

comments: _____

Section VIII. Documentation

A written annual document log must be prepared by July 1st of each calendar year, covering the previous year when at least 45 kg (99.4 lbs.) of PCB contained in PCB containers or one or more PCB transformers (500 ppm or greater), or 50 or more PCB large, high, or low voltage capacitors is used or stored at any one time (40 CFR 761.180(a)).

1. yes no Rutgers University has reached the established thresholds to meet the requirements for being required to complete annual document logs.
2. yes no If question 1 is answered 'yes,' Rutgers University has completed the log by July 1st for the previous calendar years' PCB activities.
3. yes no The Rutgers University annual document logs include the name, address, and US EPA ID number of the facility covered by the annual document log and the calendar year covered by the log.
4. yes no The Rutgers University annual document logs include the unique manifest number of every manifest generated by the facility during the calendar year.
5. yes no For bulk PCB waste, the Rutgers University annual document logs contain the weight in kilograms of PCB.
6. yes no For bulk PCB waste, the Rutgers University annual document logs contain the first date removed from service for disposal.
7. yes no For bulk PCB waste, the Rutgers University annual document logs contain the date it was placed into transport for disposal.
8. yes no For bulk PCB waste, the Rutgers University annual document logs contain the date of disposal, if known.
9. yes no The Rutgers University annual document logs contain the serial number (if available) or other means of identifying each PCB article (transformer or capacitor).
10. yes no The Rutgers University annual document logs contain the weight in kilograms of the PCB waste in each transformer or capacitor.
11. yes no The Rutgers University annual document logs contain the date it was removed from service for disposal.
12. yes no The Rutgers University annual document logs contain the date it was placed into transport for disposal
13. yes no The Rutgers University annual document logs contain the date of disposal if, known.

- 14. yes no The Rutgers University annual document logs contain a unique number identifying each PCB container.
- 15. yes no The Rutgers University annual document logs contain a description of the contents of each PCB container, such as liquid, soil, cleanup debris, including the total weight in kilograms of each PCB container,
- 16. yes no The Rutgers University annual document logs contain the first date material placed in each PCB container was removed from service for disposal.
- 17. yes no The Rutgers University annual document logs contain the date it was placed in transport for disposal.
- 18. yes no The Rutgers University annual document logs contain and the date of disposal, if known.
- 19. yes no The Rutgers University annual document logs contain a unique number identifying each PCB article container (pipes, electric motors, pumps).
- 20. yes no The Rutgers University annual document logs include a description of the contents of each PCB article container, including the total weight in kilograms of the contents of each PCB article.
- 21. yes no The Rutgers University annual document logs contain the first date a PCB article placed in a container was removed from service for disposal.
- 22. yes no The Rutgers University annual document logs contain the date a PCB article was placed in transport for disposal.
- 23. yes no The Rutgers University annual document logs contain the date of disposal, if known.

comments: _____

Section IX. Spills and Cleanups

Certain Spills of PCB are required to be reported (40 CFR 761.50(a)(4), 761.120(a)(1) through 40 CFR 761.120(a)(4) and 40 CFR 761.125(a)(1) thorough 40 CFR 761.125(a)(3).

When a spill is one pound of PCB by weight and or directly contaminates surface waters, sewers, drinking water supplies, grazing lands, or vegetable gardens, the responsible party must notify the appropriate EPA Regional Office and National Response Center (NRC) @ 1-800-424-8802 and proceed to decontaminate the area, within 24 hours after discovery, according to the TSCA policy.

1. yes no This facility has had a PCB spill in excess of one pound of PCB by weight. such as the following:
 - a. spill that directly contaminates surface water, sewers or drinking water
 - b. spill that directly contaminates grazing lands or vegetable gardens

Spills of PCB to concrete require certain decontamination requirements (40 CFR 761.79).

2. yes no This facility has had a PCB spill to concrete.
3. If question 3 is answered 'yes' elaborate and identify spill: _____

4. yes no Rutgers University has prepared a documented report of the spill that includes identification of the source of the spill.
5. yes no Rutgers University has prepared a documented report of the spill that includes estimated or actual date and time of the spill.
6. yes no Rutgers University has prepared a documented report of the spill that includes date and time the cleanup was completed or terminated.
7. yes no Rutgers University has prepared a documented report of the spill that includes a brief description of the spill location.
8. yes no Rutgers University has prepared a documented report of the spill that includes pre-cleanup sampling data used to establish spill boundaries, and a brief description of the methodology used.
9. yes no Rutgers University has prepared a documented report of the spill that includes brief description of the solid surfaces cleaned and the double-wash method used.
10. yes no Rutgers University has prepared a documented report of the spill that includes certification statement signed by responsible party.
11. yes no Concrete surfaces were cleaned to < 10ug/cm, measured by a standard PCB wipe test.
12. yes no Sampling documentation shows that answer to question 13 is true.

- 13. yes no Sampling records and chain of custodies are maintained on file from the date any decontamination was done (at least three years).
- 14. yes no Records can show sampling locations for decontamination projects and can be readily available to the EPA for review.
- 15. yes no All waste generated from decontamination projects is compliant with reporting requirements in 761.180(a) and are maintained.
- 16. yes no All waste generated from PCB decontamination projects is managed in accordance with storage and disposal requirements set forth in 40 CFR 761.

comments: _____

X. PCB Ballasts

Storage of PCB ballasts must be stored before disposal under certain specific condition (40 CFR 761.65(a) through 761.65(b)(1).

- 1. yes no PCB ballasts for disposal from this facility are stored in compliance with all PCB storage requirements.

Containers used for the storage of PCB ballasts comply with the shipping specifications of the DOT (40 CFR 761.65 (c)(6) and 761.65 (c)(7).

- 2. yes no All containers used for the storage of PCB ballasts at this location are in accordance with the DOT hazardous materials regulations.
- 3. yes no PCB ballasts are properly segregated from non-PCB ballasts.

**Note- EPA recommends that all ballasts manufactured before July, 1978 be classified as containing PCB of 50 ppm or greater. Ballasts manufactured after this date are required to bear the "no PCB" label and are therefore non-PCB.*

- 4. yes no *Leaking ballasts are placed in secondary containment for disposal by incineration.*
- 5. yes no *PCB ballasts in quantities of 25 or more are disposed of in a PCB facility.*
- 6. yes no Containers that contain PCB ballasts are marked properly as PCB.
- 7. yes no Containers which contain PCB ballasts are secured properly when in storage (tight seal).

- 8. yes no This facility meets the necessary threshold for storage amounts of PCB ballasts (45 kg) to require documentation on an annual document log (40 CFR 761.180(a)).
- 9. yes no If question 6 is answered 'yes,' drums of PCB ballasts from this location are being documented on an annual document log.
- 10. yes no Each drum of PCB ballasts generated at this location has a unique ID number assigned to it?
- 11. yes no All PCB ballasts from this location are disposed of at a TSCA-approved disposal facility.
- 12. yes no All necessary paperwork documentation of disposal of PCB ballasts is in order and filed accordingly.

comments: _____

