

Reclamation Manual

Directives and Standards

Checklist 8

TOXIC SUBSTANCE CONTROL ACT (TSCA) CHECKLIST

Site/Facility: _____

Date: _____

Address: _____

EPA I.D.: _____

Use this checklist if the facility has asbestos containing material / presumed asbestos containing material (ACM / PACM), oil containing Polychlorinated biphenyls (PCBs), or reportable quantities of toxic chemicals or substances stored on-site as regulated by 40 CFR Parts 700-799 (TSCA).

Toxic Substance Control Act				
INSPECTION ITEM	CITE	YES	NO	COMMENTS
Does the facility have a designated Safety Officer?	40 CFR 763.84(g)			Name _____ Phone _____
Does the facility have a designated hazardous materials person?	49 CFR 107.305 (pending legislation)			Name _____ Phone _____
Asbestos				
Does this facility have any presumed asbestos containing material (PACM) on-site? If No, then skip to the next page - Polychlorinated biphenyls.	29 CFR 1910.1001			
Does the facility intend to remove or replace PACM?	29 CFR 1910.1001			
Will the PACM eventually be removed by facility employees or under contract?	29 CFR 1926.1101			
Will the facility have an asbestos removal team currently trained and certified under AHERA to handle and remove Asbestos containing material (ACM)?	29 CFR 1910.1001			

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Toxic Substance Control Act				
INSPECTION ITEM	CITE	YES	NO	COMMENTS
Is removed ACM disposed in accordance with TSCA and RCRA regulations?	40 CFR 61.150			
Approximately how many bags/lbs of ACM are generated each month?	40 C.F.R. 61.150			bags/mo, lbs/mo

Briefly describe the asbestos abatement program and types of ACM within the facility:

Reviewer's comments and suggestions:

Polychlorinated biphenyls

Does the facility have any electrical transformers, bushings, or other equipment that could possibly contain oil with PCBs? If No, then skip to end comments.	40 CFR 761.2			
Does the facility keep a log of equipment containing PCBs?	40 CFR 761.180			
Is the equipment inspected regularly for leaks and integrity?	40 CFR 761.30			
Is an inspection log maintained and posted?	40 CFR 761.180			
Is there secondary containment around the equipment?	40 CFR 761.30			
Are all electrical units (or other equipment) that contain oil properly placarded to indicate whether or not they contain PCBs, and do the placards indicate what levels of PCBs in parts per million?	40 CFR 761.40, 761.45			
Are all rooms containing PCB equipment placarded at the entrance?	40 CFR 761.40			
Will the equipment containing PCBs be replaced soon?	40 CFR 761.40			
When will the facility be free of all dielectric oil containing PCB?	40 CFR 761.40			Date _____
Is a certified environmental lab used for analytical testing of PCBs?	40 CFR 761.40			

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Toxic Substance Control Act				
INSPECTION ITEM	CITE	YES	NO	COMMENTS
Is used oil tested for PCBs prior to disposal or recycling?	40 CFR 761.60			
Does the facility have any areas that may be contaminated with PCB, and which may eventually require an environmental assessment and cleanup?	40 CFR 761.61			If Yes or Unsure, please explain:
Is the waste oil containing PCBs stored in good quality DOT approved drums prior to disposal?	40 CFR § 761.65			
Are the drums placarded with the appropriate TSCA label?	40 CFR § 761.65, 761.40			
Are the drums stored in a secure weatherproof area?	40 CFR § 761.65			
Is the oil analyzed by a certified lab prior to disposal?				
Is a TSCA manifest prepared prior to pickup and disposal?	40 CFR § 761.60			
Are detailed records kept a minimum of 5 years for cradle to grave tracking of disposal manifests, analytical results, and all associated documentation?	40 CFR § 761.180			

Comments: _____
