

MANAGING PCBs DURING BUILDING DEMOLITION PROJECTS REGIONAL COORDINATION OF DATA COLLECTION

Background

This document summarizes the regional process to collect data from the new program to manage PCBs during building demolition. Data collection will start with implementation of the new program on July 1, 2019. Regional collection and compilation of these data will help BASMAA to support Permittees in complying with the MRP reporting requirements related to managing PCBs during building demolition projects. In addition, when sufficient amounts of new data have been collected, the data will support:

- Development of a revised estimate of the reduction in PCBs loading to stormwater runoff resulting from implementation of the new program.
- Evaluation of various aspects of the PCBs management program and the effectiveness of potential future refinements.

Regional Data Collection Process

1. The municipality informs demolition permit applicants that their projects are subject to the MRP Provision C.12.f requirements, necessitating, at a minimum, an initial screening for priority PCBs-containing materials.
2. For every demolition project, applicants complete and submit a version of BASMAA's model "PCBs Screening Assessment Form" (Screening Form) or equivalent to the municipality.
3. The municipality reviews the Screening Form to make sure it is filled out correctly and is complete and works with the applicant to correct any deficiencies.
4. The municipality then issues the demolition permit or equivalent, according to its procedures.
5. The countywide programs will compile the completed Screening Forms and any supporting documents (at a minimum annually, but quarterly is preferred). Municipalities submit forms for *applicable structures* only to the countywide program; forms for exempt sites need not be submitted. The countywide program compiles the forms and works with the other MRP countywide programs to manage and evaluate the data, and to assist Permittees with associated MRP reporting requirements.

Note on regional data collection process:

- Municipalities should require that applicants fill out and certify a Screening Form for every demolition. For non-applicable buildings, applicants simply check the boxes, certify, and submit to the municipality. Then the municipality can authorize the demolition (e.g., issue a demolition permit). In general, municipalities should have a completed and certified Screening Form before authorizing a demolition, unless they are a small community that is exempt or has some other arrangement with Regional Water Board staff. There is no need to track non-applicable buildings, but it may be advisable for the municipality to keep records for purposes of proving compliance with the permit provision.