

TSCA PCB Compliance Inspections

What to Expect & How to Prepare

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April 11, 2024

SUPPORTING

[DOING]

LEADING

Agenda

- Regulatory Background
- Agency Inspections: Managing and Preparing
- EPA PCB Inspection Manual: What's the Scope
- PCB Question and Answer Manual (2014 and upcoming)
- PCB Penalty Policy: How Bad is it?
- EPA Audit Policy: What if We Find It and Fix It?
- State Audit Policy and PCBs
- Conducting Compliance Audits
- Select Enforcement Scenarios



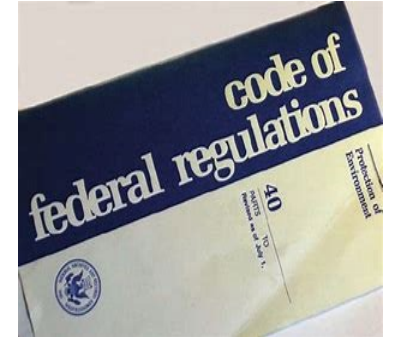


Brief Regulatory Background

- **1976** - Due to PCB Toxicity and Environmental Persistence Concerns, Congress enacted Section 6(e) of the Toxic Substances Control Act (TSCA).
- **1979** - PCBs banned except for “totally enclosed uses”, such as transformers, capacitors, vacuum pumps and hydraulic fluids (a.k.a., authorized uses).
- **1998** - PCB Disposal Amendments (a.k.a., the Mega Rule).
- **2023** - PCB Disposal Amendments (effective 2/26/24).

General Regulatory Provisions

- **Prohibitions** - The TSCA PCB regulations (40 CFR Part 761) placed prohibitions on the use (manufacture), processing, and distribution in commerce and specify storage and disposal requirements for PCBs and PCB items.
- **Regulatory Framework** - Governs owners, operators, and/or persons who own equipment with PCBs, use/store/dispose of PCBs, conduct cleanup of PCB-contaminated property where the PCB contamination exceeds allowable concentrations under the regulations.
- **Not Delegated** - TSCA authority is not delegated to the states; therefore, both TSCA and state regulations (where present) will apply. States cannot apply more stringent controls on the use of PCBs, just to the disposal of PCBs – including storage for disposal.



[federal-regulations.png \(548x412\)](#)
[\(acton.org\)](#)

Agency Inspections

Managing and Preparing

Triggers for Inspections

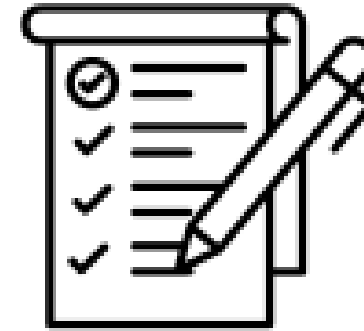
- Periodic compliance check (EPA, OSHA)
- Active commercial facilities (storer/disposer, etc.)
- Tips/Complaints by outside party
- Employee complaint (“whistleblower”)
- Follow-up to prior inspection/corrective action
- Change in scope of business/expansion
- New facility/change in ownership
- Other information, such as spill reports, manifests receipts, including rejections by storage/disposal facility
- Site cleanups

Do You Allow an Inspection?

- Authority to conduct inspections is given to federal or state agencies under specific environmental, labor or other laws/regulations (e.g., Section 11 of TSCA).
- Specific EPA permits/approvals may provide for inspections and/or provide for potential revocation if entry not allowed.
- Search warrants or other specific authority in extreme cases, including failure to allow entry either before and/or during inspection.

What Happens First?

- Arrival and announcement of the Inspectors
- Inspections may be unannounced
- Agency will present Notice of Inspection and credentials upon entry
- Ask the purpose of the Inspection
- Notify facility response team, if applicable
 - On-site team
 - Corporate team
 - Internal/External legal counsel
- Convene a pre-inspection conference
- Regions – using their TSCA funding – can contract with states to perform audits on their behalf



| Region | States Receiving EPA Grant Funding for TSCA PCB Compliance Inspections |
|--------|--|
| 1 | Connecticut |
| 2 | None |
| 3 | None |
| 4 | Alabama; Kentucky; and Tennessee |
| 5 | Indiana and Illinois |
| 6 | unknown |
| 7 | None |
| 8 | None |
| 9 | None |
| 10 | None |

Pre-Inspection Conference

- Meet in Conference Room
- Agency will present credentials and authority/purpose/scope of inspection; if not, ask
- Identify/introduce individuals
- Agency will provide background and expectations, and present any forms requiring up-front signature:
 - Notice of Inspection/TSCA CBI Notice
 - Areas to be inspected
 - Documents, photographs, testing/sampling protocols
- Topics Agency may cover upfront: general facility information and operations, and PCB-specific information, including records it may want to review before proceeding with inspection. Provide a facility diagram (if available).
- Facility may require Safety Briefing - EPA generally will not sign facility documents



Conducting the Inspection

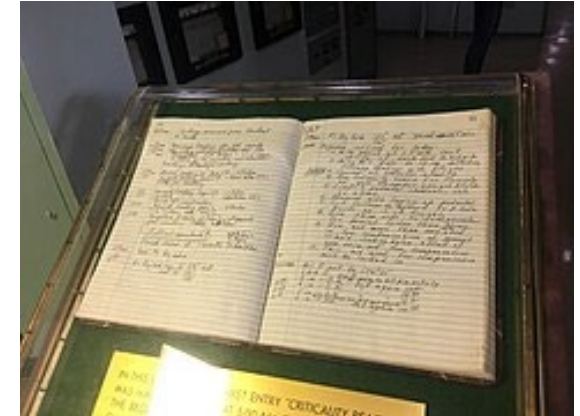
- Escort inspectors at all times.
- EPA will record FACTUAL and observed information, non-conclusory notes.
- Take your own photos (if they do).
- Keep records of requested/provided documents
- Answer questions directly based on facts – NO GUESSING!
- Tell the truth.
- “I’m not sure – there’s a management system procedure.”
- “I’m not sure – you should confirm with the program manager.”



Documents / Records

Inspections may ask for (and generally have a right to) copies of records that are required to be maintained. These can be in paper or electronic form.

- Plans, Policies and Procedures, such as (where applicable):
 - Hazardous Waste Management Plan
 - Hazard Communication Program (HAZCOM)
 - Spill Prevention Control & Countermeasure (SPCC) Plan
 - SOPs for conducting cleanup of spills
 - Analytical data
- Training logs, certifications or other records, as required by regulations and/or approvals/permits
- Waste manifests, chemical or hazmat inventories, or other operational records and applicable Certificates of Disposal
- Inspection records and annual logs/reports
- Supporting documentation for Reporting (e.g., Spill Cleanups, approval requirements, etc.)



Oak Ridge National Laboratory X-10 Reactor
Logbook Reproduction.jpg

Sampling

Equipment Sampling or Remediation Site Sampling

- Inspectors can take samples.
- Facility should split samples.
- Facility should confirm the analytical methods that the inspectors will use and confirm that EPA will provide a copy of its lab results to you.
- Copy and retain EPA's Chain of Custody for your records.
- Goal of splits: Confirm EPA's testing results.



Indicators of Potential PCB Violations to Be Aware of:

Abandoned or discarded potential PCB-contaminated equipment, parts, or containers.

- Transformers
- Capacitors
- Fluorescent light ballasts
- Drums

Obvious spills or leaks

- Discoloration of the soil near PCB Items, in drainage systems, or on the banks of streams
- Oil sheen on the surface of streams or standing water
- Highly saturated soils
- Oily rags, debris, or other material
- Puddles or drips on or near equipment, containers, drip pans, or floors
- Dead grass or other dead vegetation
- Odor of chlorinated solvents - especially of trichlorobenzene, the principal solvent for PCBs (the presence of detectible odor may indicate concentrations of PCBs over 5000 ppm)
- Stains on equipment near spigots, cooling tubes, gauges, or insulators. Older stains may have dust accumulations on them.



Wikimedia Commons File:Leaking drums (4097921041).jpg



Improperly stored/marked PCB Articles, PCB Items, PCB Containers, etc.

Post-Inspection Closing Conference

- Reconvene in conference room.
- Inspectors will summarize observations.
- May inform facility of problems that need immediate attention or corrective action.
- Will not discuss violations.
- Inspector will review documents requested.
- Closeout forms will include receipts for documents and samples collected and CBI claims. Copies will be provided to facility.
- If requested by facility, EPA may discuss any PCB regulatory questions a facility may have.

Internally:

- Follow-up with facility and corporate management.
- Discuss with legal counsel.
- Note lessons learned and opportunities for improvement.



Best Practices for Preparing

- Prepare an agency inspection checklist or procedure
- Identify specific individuals for the response team (with backups)
- Practice responding to an inspection
- Refresh the plan often
- Prepare your employees (not just managers) for inspections
- Know where your documents/records are kept and how to assess
- Make compliance an every-day priority – practice good housekeeping, maintenance/repair/decon procedures/records, proper records management and reporting, training, etc.
- **Understand your operations and wastes (PCBs, hazardous, universal, electronics, etc.), and storage/disposal requirements for ongoing compliance**
- Consider pro-active compliance audits

Key Guidance Documents

EPA PCB Inspection Manual
EPA PCB Q&A Manual

PCB Inspection Manual



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Revisions to the PCB Q and A Manual

(June 2014)

About the PCB Question and Answer Manual: The PCB Q and A manual is a living document and is periodically revised and updated. The updates are posted on the EPA PCB web site at www.epa.gov/pcb for our customer's use. It is recommended that our customers periodically check this web page for updates instead of relying solely on a single hard copy. Each update or revision will be dated. This date will appear as a header on each page of the manual and will also appear on the web site.

2014 Revisions –

1. EPA edited the table on page 42, "TSCA Storage Disposal Requirements for Fluorescent Light Ballasts," to include the storage options for PCB fluorescent light ballasts. Additionally, EPA made a technical correction to the table. The previous version of the table incorrectly specified that PCB fluorescent light ballasts that are able to be disposed of as a PCB bulk product waste did not have any labeling requirements. While disposal of such PCB fluorescent light ballasts under 761.62(b) does not require labeling (see 761.62(b)(6)), disposal under 761.62(a) does require labeling and disposal under 761.62(c) may require labeling.

2009 Revisions –

1. Question 3, Page 92, has been revised to reflect the transfer of the PCB Cleanup and Disposal Program from the Office of Pollution Prevention and Toxics to the Office of Solid Waste and Emergency Response and the name change of the Office of Solid Waste to the Office of Resource Conservation and Recovery.

This policy addresses use, cleanup, and disposal requirements for polychlorinated biphenyls (PCBs) only. This document is intended to be used as an informal reference, and as such, is not a complete statement of all the applicable PCB requirements. This document does not replace nor supplant the requirements of the Toxic Substances Control Act (TSCA) PCB regulations. Please refer to the regulations at 40 CFR Part 761 for specific regulatory and legal requirements.

- 2 **Q:** *What is the difference between storage for disposal and storage for reuse?*
A: You may store a PCB Article for reuse if you plan to reuse the article and you maintain it in usable condition. In that case, you must follow the storage for reuse requirements at §761.35. If you are storing PCBs, including a PCB Article, that you do not plan to reuse or that you have decided to dispose of, then the PCBs are in storage for disposal and you must follow the storage for disposal requirements at §761.65.
- 3 **Q:** *I am storing a PCB Article that has never been used. Is the article in "storage for reuse"?*
A: If you have a PCB Article in storage, under the regulations you must treat it as either in storage for reuse or in storage for disposal, depending on whether you intend to use or to dispose of the article when you remove it from storage. You do not have to have used the article in the past for the article to be in storage for reuse. If you do not intend to use the article, it is in storage for disposal and you must dispose of it within one year of the date you decide to dispose of it.
- 4 **Q:** *What is the status of equipment that I have taken out of service but am still evaluating for use or disposal? For example, I have had a transformer tested for PCB concentration, but the test results are not yet available. Is the transformer in use, in storage for disposal, or in storage for reuse?*
A: You must treat a transformer or other PCB Article that is removed from service as either in storage for reuse or in storage for disposal. If you have not yet determined to dispose of the transformer, treat it as in storage for reuse.
- 5 **Q:** *Does §761.35 apply to interim storage articles prior to classification, such as pulled transformers that are waiting to be tested?*
A: Yes. Since you have removed the transformer from service, you must treat it as either in storage for reuse or in storage for disposal. If you have not yet decided to dispose of the transformer, treat it as in storage for reuse.
- 6 **Q:** *What requirements apply to the storage for reuse of electrical equipment like cable and electrical starters left in place inside old,*

EPA PCB Penalty Policy

PCB Penalty Policy

- When EPA identifies violations of the PCB provisions of TSCA, EPA responds to such violations in accordance with the April 9, 1990 PCB Penalty Policy.
- The purpose of the PCB Penalty Policy is to ensure that penalties for violations of the various PCB regulations are fair, uniform and consistent, and to deter people from committing PCB violations.
- TSCA is a strict liability statute (compared to RCRA) and there's no requirement that a violator's conduct will be willful or knowing to be found a violation.

EPA may view the “nature” of a violation – storage vs disposal; concentration and quantity; duration – very differently in the penalty “rating” in terms of damage – and it may vary from Region to Region.

PCB Penalty Policy

- The policy implements a system for determining penalties in administrative civil actions brought pursuant to Section 16 of TSCA. Penalties are determined in two stages: (1) determination of a “gravity-based penalty” (GBP), (2) adjustments to the gravity-based penalty.
- To determine the GBP, the following factors affecting a violation’s gravity are considered:
 - The “**nature**” of the violation
 - The **extent** of potential or actual environmental harm from a given violation
 - The **circumstances** of the violation
- The Policy also presents other factors for consideration, such as multiple violations, repeat violations, history of prior violations, and ability to continue in business.

| GRAVITY BASED PENALTY MATRIX | | | |
|---|----------------------------|---------------|-----------|
| Circumstances (probability of damages) | Extent of Potential Damage | | |
| | A - Major | B-Significant | C - Minor |
| High Range | | | |
| Level 1 | \$25,000 | \$17,000 | \$ 5,000 |
| Level 2 | 20,000 | 13,000 | 3,000 |
| Medium Range | | | |
| Level 3 | 15,000 | 10,000 | 1,500 |
| Level 4 | 10,000 | 6,000 | 1,000 |
| Low Range | | | |
| Level 5 | 5,000 | 3,000 | 500 |
| Level 6 | 2,000 | 1,300 | 200 |

GBP Matrix with Penalties in 1990 Dollars

PCB Penalty Policy

- PCB enforcement penalties are outlined in TSCA Section 16(b)/15 USC 2615: Penalties.
- How much is it for 2024 vs 1990? Section 16(b), revised for 2016, \$48,512/day civil and \$50,000/day criminal per violation, versus \$25000/day per violation in 1990. Penalties under TSCA, like other environmental statutes are subject to inflation.
- States are pre-empted under TSCA from issuing TSCA enforcement cases unless they have TSCA look-alike laws. Currently no state has implemented legislative authority to take TSCA enforcement actions.

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Appendix C Civil Penalty Assessment Worksheet

Name of Respondent: _____
 Address of Respondent: _____

(1) Complaint I.D. Number: _____
 (2) Date Complaint Issued: _____
 (3) Date Answer Received: _____
 (4) Date Default Order Sent: _____
 (5) Date Consent Agreement Signed: _____
 (6) Date Final Order Sent: _____
 (7) Date Remittance Received: _____

| | |
|--|----------|
| 1. Gravity Based Penalty (GBP) from matrix: | \$ _____ |
| 2. Percent increase or decrease for culpability: | _____ % |
| 3. Percent increase for violation history: | _____ % |
| 4. Add lines 2 and 3: | _____ % |
| 5. Multiply GBP by percentage total on line 4: | \$ _____ |
| 6. Add lines 1 and 5 (subtract line 5 from line 1 if negative percentage): | \$ _____ |
| 7. Enter line 6 amount or \$25,000, whichever is <u>less</u> : | \$ _____ |
| 8. Multiply line 7 by the number of days or violations: | \$ _____ |
| 9. Government clean-up costs, if any: | \$ _____ |
| 10. Economic gains from non-compliance, if appropriate: | \$ _____ |
| 11. Add lines 8 through 10: | \$ _____ |
| 12. Total of other adjustments as justice may require: | \$ _____ |
| 13. Add (or subtract) line 12 to (from) line 11: | \$ _____ |

Note: Line 13 should be the proposed penalty for a given violation. The procedure is repeated for each violation.

Appendix C Worksheet

EPA Audit Policy

Audit Policy

Introduction

- The EPA Audit Policy, officially titled “Incentives for Self-Policing: Discovery, Disclosure, Correction, and Prevention of Violations,” provides incentives for regulated entities to proactively address violations of federal environmental laws and regulations.
- This presentation is based on the 2021 guidance but shows the progression of PCB and Audit Policy development since the 1980s.
- In 2008, EPA added incentives for **new owners** of non-compliant facilities and implemented eDisclosure system to process violation disclosures.
- A companion **Small Business Compliance Policy** was established at the same time.



EPA's Audit Policy Program:
Frequently Asked Questions

January 2021

Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
Washington, D.C.

Audit Policy

Summary of US EPA Incentives

- **Significant penalty reductions:** Civil penalties under the environmental laws generally have two components: (1) an amount assessed based upon the severity or “gravity” of the violation; and (2) an amount assessed to recapture the economic benefit a violator received from failing to comply with the law. The policy covers the “gravity” penalties only.
- **No recommendation for criminal prosecution** for entities that disclose criminal violations if all of the applicable conditions under the Policy are met. “Systematic discovery” is not a requirement for eligibility for this incentive, although the entity must be acting in good faith and adopt a systematic approach to preventing recurring violations.
- **No routine requests for audit reports:** EPA reaffirms its Environmental Auditing Policy Statement, in effect since 1986, to refrain from routine requests for audit reports (*i.e.*, EPA has not and will not routinely request copies of audit reports to trigger enforcement investigations).

Audit Policy

Conditions for Penalty Mitigation / Meet All 9

- Systematic Discovery – Audit or CMS
- Voluntary Discovery
- Prompt Disclosure (21 days)
- Discovery Independent of EPA/State Action
- Correction and Remediation
- Prevent Recurrence
- No repeat Violations
- Certain Violations Excluded (actual harm)
- Cooperation

Audit Policy

Limitations/Drawbacks to use of the EPA Audit Policy

- Violations from certain major EPA Programs are not eligible:
 - Clean Air Act, emissions violations
 - Clean Water Act, NPDES discharge violations
- Placing your organization on EPA's radar screen
- May still incur economic benefit penalties
- Does not apply to violations of State regulations
- Potential for new owners to be protected against past liability for non-compliance
- Sellers beware – disclosure of past violations by new owners may lead to enforcement actions against prior owners

Note: The “New Owner” Option offers relief for these emissions and discharge violations

State Audit Policies / State Disclosures

Additional Cautions

- **States** have voluntary disclosure programs that provide **audit privilege and/or penalty immunity** for self-disclosed violations - each State's audit policy varies
- Consider the following when deciding whether to make a disclosure to EPA, the State, or both:
 - Type of regulation violated,
 - Availability of a state audit program, and
 - Scope of legal relief sought.
- Only EPA can resolve violations of federal laws for which no state-authorized program exists (e.g., **TSCA** or EPCRA). For violations of federal statutes for which a state-authorized program exists (e.g., the Clean Water Act), an entity may choose to disclose to either regulator or both.

Conducting Compliance Audits

Leveraging the Audit Policy

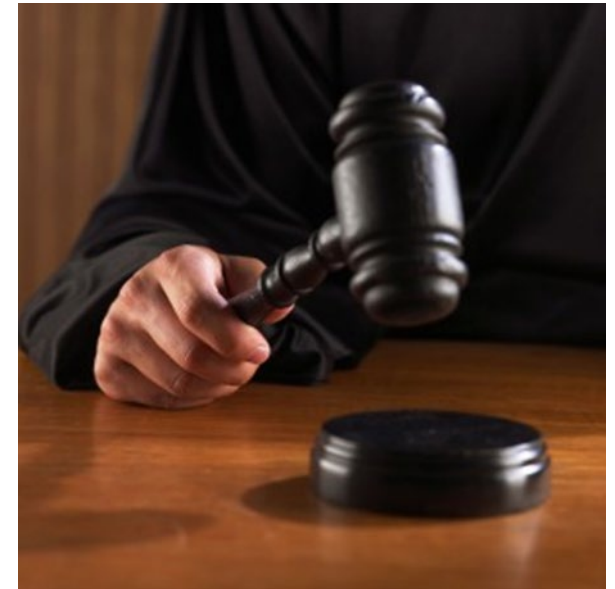
What are Environmental Self-Audits/Compliance Audits?

- On-site inspection of a facility, which consists of a walk-through by an experienced environmental consultant; and
- Review of relevant documentation such as available environmental permits, reports, and operational data such as waste manifests and maintenance records.
- ASTM Practice E2107-06 (Reapproved and last updated 2014).
- ISO14001, Element 4.6.
- Audit protocols serve as checklist and method to evaluate compliance with environmental requirements. **Additionally, evaluate compliance with the conditions in facility-specific environmental permits.**
- Vendors / consultants provide the methods and content – and can focus on the topic (e.g., PCBs) at hand.
- EPA has developed protocols for industry use, too.

How to Perform Environmental Compliance Audits

Use of Legal Counsel / Maintaining Privilege

- Legal counsel protect audits under attorney-client privilege and attorney work-product doctrine.
- Without privilege, sensitive audit results typically can be requested and obtained by regulators in the context of an inspection and/or enforcement action.
- Some courts may not distinguish the activities of in-house counsel between acting as a legal advisor to the company and as a “business consultant.”
- Most industries retain experienced outside environmental counsel (even if they closely coordinate with inside environmental counsel), who then will retain the environmental consultant.



How to Perform Environmental Compliance Audits

In addition to in-house EH&S capability, consider these advantages to using an outside consultant, at least for an initial audit:

- Availability of internal resources/skill level
- Objectivity / defensiveness of plant personnel/
perpetuation of past mistakes/extra set of “eyes”
- Conflict of interest/Checks and Balances
- Maintaining Privilege/Retaining consultant through
legal counsel

Other Variations of Environmental Self-Audits

- **Management System-Driven/Programmatic:** Required on a cyclic basis, either by your ISO14001 EMS or corporate program design.
- **Acquisition Audits:** Conduct environmental compliance audits when acquiring a company or business unit that engages in any type of manufacturing or industrial operations
 - Evaluate for liabilities and future costs involved in bringing the facility into compliance, either before or during acquisition
 - Frequently conducted along with Phase I and may be “limited” in nature

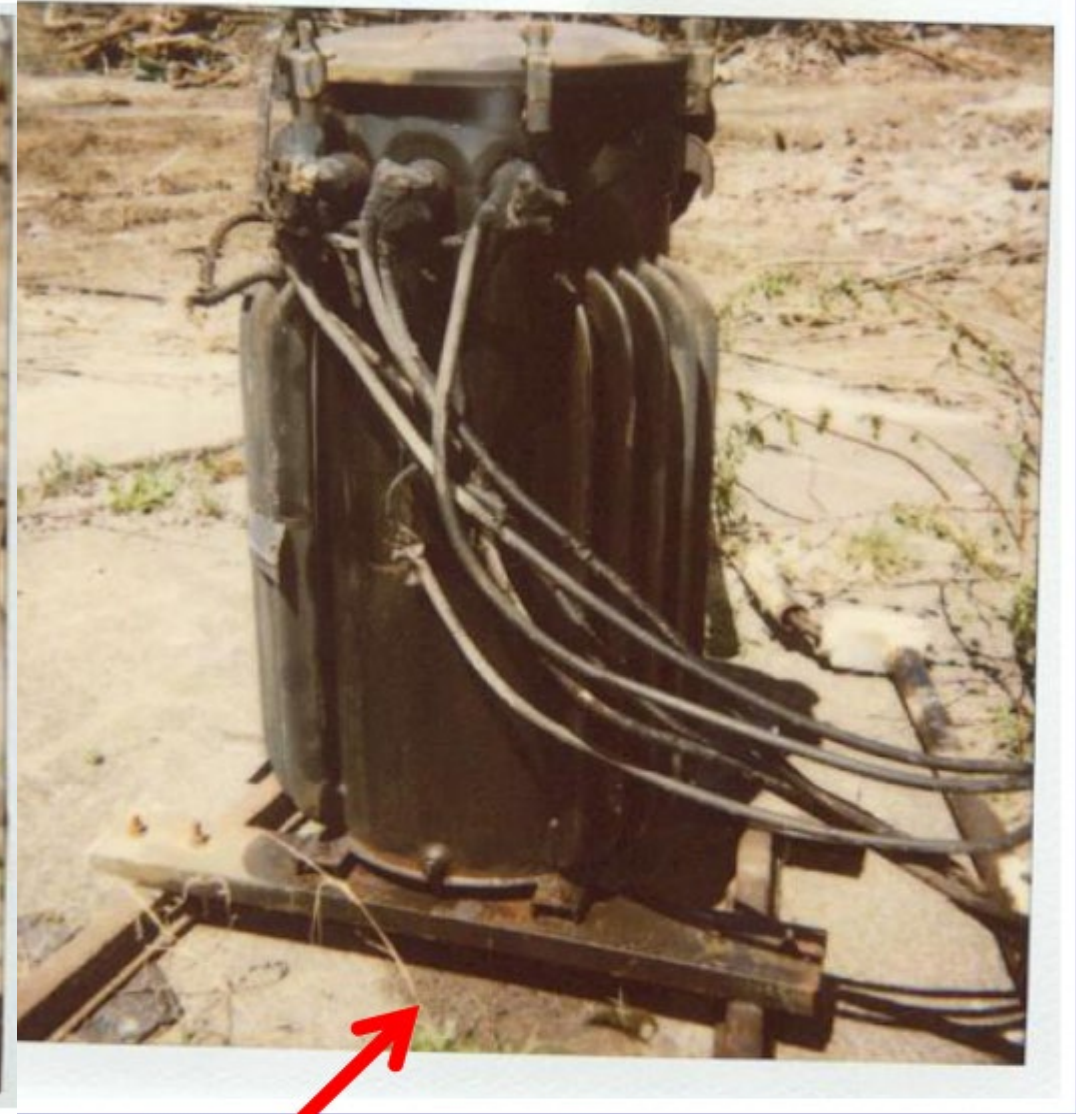
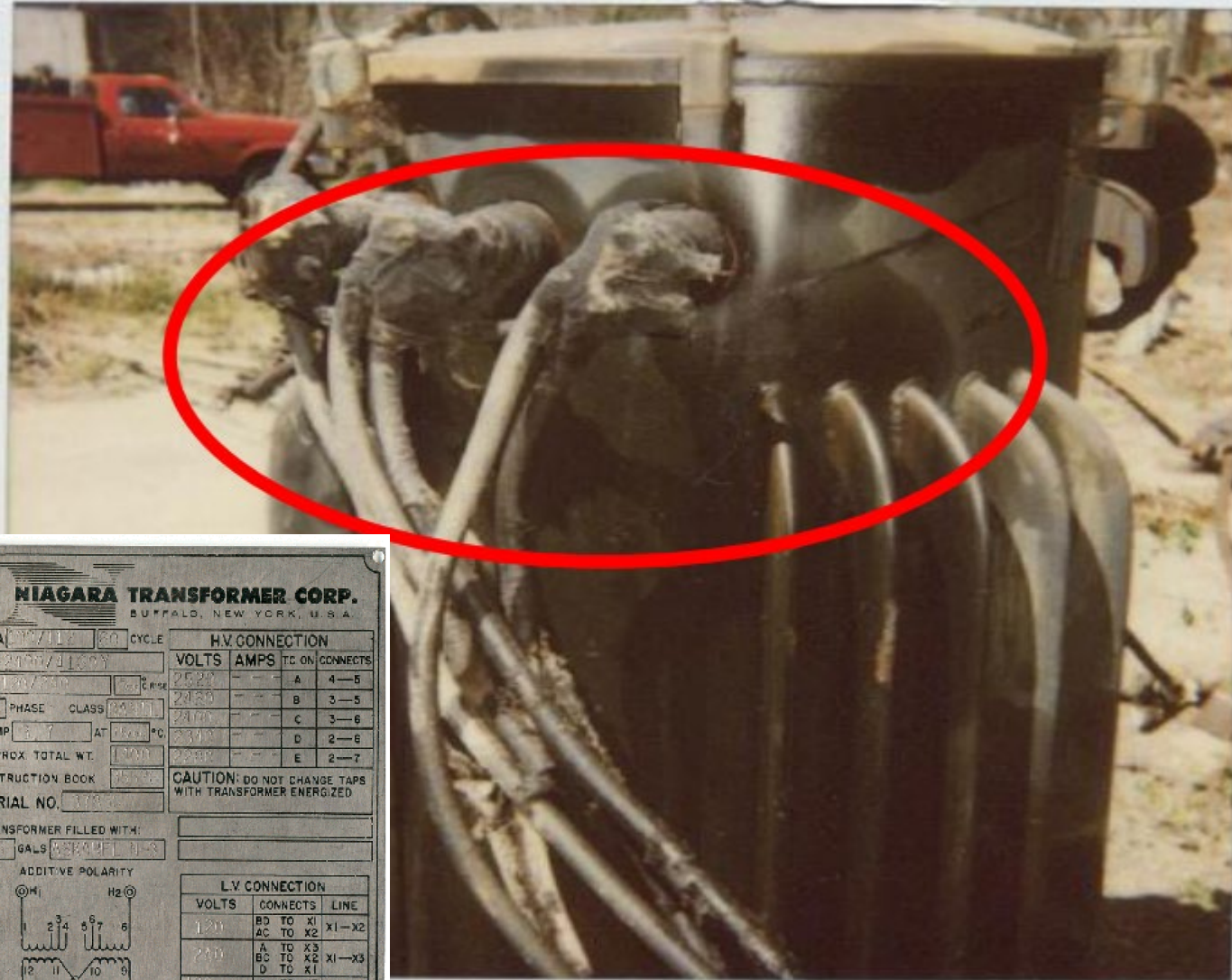


Post-Audit Considerations

- Post-audit, the recommendations and conclusions should be assessed to evaluate how corrective action will be taken.
Consider:
 - Self-disclosure of identified violations?
 - Coming into compliance “quietly”?
- Set up a periodic environmental audit schedule, such annual, triennial, or risk-based basis.
- Regulatory authorities typically are more lenient with operations that have a robust environmental management and audit protocol (one of the incentives under the Audit Policy).

Example Scenarios

Scenario #1



NIAGARA TRANSFORMER CORP.
BUFFALO, NEW YORK, U.S.A.

KVA: 100 CYCLE: 60

H.V. CONNECTION

| VOLTS | AMPS | TC ON | CONNECTS |
|-------|------|-------|----------|
| 2520 | | A | 4-5 |
| 2400 | | B | 3-5 |
| 2400 | | C | 3-6 |
| 2310 | | D | 2-6 |
| 2280 | | E | 2-7 |

L.V. CONNECTION

| VOLTS | CONNECTS | LINE |
|-------|--------------------------------|----------|
| 120 | BD TO X1 AC TO X2 | X1-X2 |
| 240 | A TO X3 BC TO X2 | X1-X3 |
| 480 | D TO X1 A TO X3 BC TO X2 | X1-X2-X3 |

PHASE CLASS: 240/110

% IMP: 5.7 AT 100% PC

APPROX. TOTAL WT.: 1000

INSTRUCTION BOOK: 7510

CAUTION: DO NOT CHANGE TAPS WITH TRANSFORMER ENERGIZED

SERIAL NO.: 37035

TRANSFORMER FILLED WITH: 100 GALS. SAE OIL 10-30

ADDITIVE POLARITY

FOAM A-1-60 A 8004

Scenario #2



Scenario #3



Select PCB Guidance Documents

- EPA PCB Enforcement Policy
 - [Polychlorinated Biphenyls \(PCB\) Penalty Policy | US EPA](#)
- EPA Audit Policy
 - [EPA's Audit Policy | US EPA](#)
- TSCA Section 16(b) / 15 USC 2615: Penalties (house.gov)
 - [15 USC 2615: Penalties \(house.gov\)](#)
- EPA's Audit Policy Program: Frequently Asked Questions January 2021
 - <https://www.epa.gov/compliance/epas-audit-policy-program-frequently-asked-questions>
- June 2017 PCB Facility Approval Streamlining Toolbox
 - [PCB Facility Approval Streamlining Toolbox \(FAST\): Streamlining the Cleanup Approval Process | US EPA](#)
- May 2021 PCBs in Building Materials Fact Sheet
 - [PCBs in Building Materials - Determining the Presence of Manufactured PCB Products in Buildings or Other Structures | US EPA](#)
- September 2023 Technical Guidance for Determining the Presence of Manufactured PCB Products in Buildings and Other Structures
 - [Technical Guidance for Determining the Presence of Manufactured PCB Products in Buildings and Other Structures | US EPA](#)

Thanks!

Let us know if you have any questions.



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