



Polychlorinated Biphenyls (PCBs)

What are polychlorinated biphenyls (PCBs) and how are they regulated?

PCBs are mixtures of synthetic and organic chemicals that take the form of oily liquids, waxy solids, or vapor. PCBs are non-flammable, chemically stable, and have high boiling points. Due to their high level of stability, PCBs have been used in hundreds of industrial and commercial applications and products. PCBs are regulated under the Toxic Substances Control Act (TSCA). TSCA prohibits PCB use, manufacturing, processing, and distribution in commerce.

Where are PCBs found?

While PCBs are no longer manufactured in the United States, PCBs can be found in products still in use and in products that have been abandoned, disposed of, or stockpiled. PCBs were used as insulators and coolants for electric cables and components, and therefore are commonly found in transformers, capacitors, and old industrial equipment. PCBs were also used as additives for extreme pressure lubricants and as coatings in foundry use.

Why is exposure to PCBs a concern?

Exposure to PCBs are a concern because PCBs are linked to adverse human health effects and are widely believed to pose an increased risk of cancer in humans subjected to long-term exposures. PCBs do not readily break down in the environment and can remain for long periods of time cycling between air, water, and soil. Human exposures to PCBs can occur from ingesting contaminated food, water, and air, as well as industrial exposure from the operation, maintenance, and disposal of PCB transformers and equipment.

What is the Landholding Agency (LHA) responsibility when reporting a property that contains PCBs excess to GSA?

The LHA is responsible for identifying whether the property has any known PCBs. If PCB transformers or PCB-containing equipment are present, the LHA must provide a written assurance in the Excess Real Property Checklist that it will maintain all PCB transformers or equipment in compliance with Federal requirements until the date of transfer. The Excess Real Property Checklist is the due diligence supplement to the Standard Form 118.

What information should the LHA submit with the Excess Real Property Checklist?

The LHA should identify whether there are known PCBs on the property being reported excess. The LHA must provide the following information to GSA in the Excess

Real Property Checklist:

- Certification that the property does or does not contain PCB transformers or equipment regulated by the EPA under 40 CFR Part 761;
- An inventory of all PCB transformers and equipment on the property; and
- An assurance that the equipment is currently in compliance and will be maintained in compliance until the date of property transfer.

This information can often be found in operation and maintenance plans and building contracting documents.

Are PCBs regulated under CERCLA?

Yes, if PCBs are released into the environment and are above reportable quantities, the LHA must identify the release on the Hazardous Substance Activity Certification in the Excess Real Property Checklist.

What is GSA's role as the disposal agent?

Prior to disposal, GSA is responsible for verifying all PCB-related information provided by the LHA. When conveying property containing PCBs, GSA includes a written statement that the property contains PCBs in the Invitation for Bid, Offer to Purchase, Assignment Letter (if applicable), and deed. If the PCBs are present in equipment owned by the government, GSA includes an additional statement providing assurance that the equipment has been maintained in compliance, and will be maintained in compliance until the date of property transfer.

Who is responsible for maintaining equipment containing PCBs after GSA accepts the property from the LHA?

The responsibility for maintaining any PCB transformers or equipment resides with the LHA until the date of transfer. The LHA must also provide written documentation that establishes current compliance status of all PCB equipment. The LHA must:

- Clearly mark or label certain PCB transformers and equipment with the correct warnings.
- Perform routine inspection requirements to ensure compliance until transfer.

Where can I find additional information on PCBs?

EPA Office of Pollution Prevention and Toxics: <http://www.epa.gov/epawaste/hazard/tsd/pcbs/index.htm>

EPA Hazardous Wastes: <http://www.epa.gov/osw/hazard/tsd/pcbs/index.htm>