



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

SELF-IMPLEMENTING CLEANUP AND DISPOSAL § 761.61(a)(3) CHECKLIST

I. Cleanup and Disposal Notification to EPA with the following:

- Cover letter stating purpose of the submission and signed by the Site owner or operator, or by the party responsible for conducting the cleanup, such as a former Site owner.

- A plan which includes the following information:
 - Site background and history. This should include a discussion of past activities (e.g. use of PCBs and/or PCB equipment, storage, manufacturing, etc), site ownership, and current or proposed site uses. This section should also include information on any cleanups/remediations that have occurred at the Site.

 - The nature of the contamination, including the kinds of materials contaminated (§ 761.61(a)(3)(i)(A)).

 - A summary of the standard operating procedures (SOPs) employed during characterization of the Site, including a table or cleanup Site map showing PCB concentrations measured in the pre-cleanup characterization samples. The SOPs must include information on the field sample collection procedures and field and/or laboratory extraction and analytical procedures (§ 761.61(a)(3)(i)(B)).

 - A Site map showing the PCB sampling locations cross referenced to the sample identification numbers provided as part of the characterization information. The extent of the identified PCB contaminated area(s) must be clearly identified (§ 761.61(a)(3)(i)(C)).

- Copies of the laboratory analytical reports of the characterization sampling, including field and laboratory quality assurance/quality control samples, should be provided to document the extraction/analytical dates and methods and laboratory QC (§ 761.61(a)(3)(i)(C)).

If extensive, the laboratory analytical reports may be provided on a CD-ROM.

- A cleanup plan for the Site, including the proposed disposal technology and approach, and a cleanup schedule. ***The plan must include contingency plans in the event that higher PCB concentrations and/or a wider distribution of PCBs are identified during the cleanup*** (§ 761.61(a)(3)(i)(D)).
- A written certification, signed by the owner of the property where the cleanup site is located and the party conducting the cleanup, that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at the location designated in the certificate, and are available for EPA inspection (§ 761.61(a)(3)(i)(E)).
- Subpart Q alternative method: If an alternative method of extraction and/or analysis is/will be used, the certification shall include a statement to this fact and that a comparison study which meets or exceeds the requirements of Subpart Q has been completed prior to the verification sampling. In the event that the alternative extraction and/or analytical method was previously validated under Subpart Q using materials from other projects, the laboratory must provide a certification that the sample types used during that comparison study are similar to (e.g., % organic content, grain size, etc) the sample types that will be cleaned up under the Notification. A copy of the Subpart Q comparison study should be included in the Notification (§ 761.61(a)(3)(i)(E)).
- QA/QC plan for documenting that the cleanup levels have been achieved (e.g. confirmatory sampling/analysis QA/QC). The QA/QC plan should at a minimum include information on the types/numbers of samples; extraction/analytical methods; MS/MSDs (both frequency and acceptance criteria), etc. The QA/QC plan should also discuss data validation.

- In the event that the party conducting the cleanup is not the Site owner (for example, the party could be a previous Site owner), EPA will require documentation that the party conducting the cleanup legally has the authority to access the Site and to conduct the proposed PCB activities. This documentation for example may be in the form of a Site Access Agreement stating this fact or perhaps in a lease agreement or a property transfer agreement.

- If a cleanup will involve the use of a cap, the cap design specifications and a cross-section showing the design should be provided. Please insure that it is clear where the cap will be used. ***Please note: the use of a cap will require a deed notation documenting this fact and the limitations on the use of the Site (§§ 761.61(a)(7) and (8)).***

II. **Important Considerations:**

This checklist provides only a summary of the information that is specified under § 761.61(a)(3), is for reference only, and is not intended to replace the requirements of the PCB regulations.

Region 1 requires that the SOPs and QA/QC information be submitted as part of the Notification.

The Notification may include any additional information that supports the proposed cleanup, such as information regarding state regulations, community involvement (especially for schools), and environmental justice communities. In addition, any documentation that has been developed for a state regulatory agency, such as a remedial investigation report, may be submitted to support the pertinent required documentation in lieu of generating a new document.

The 30-day default timeframe for EPA review of a Self-Implementing PCB Cleanup and Disposal Notification (§ 761.61(a)(3)(ii)) does not apply if the proposed PCB plan does not follow the prescriptive cleanup and disposal procedures and provisions specified under § 761.61(a).