

Process Title:	PCB Containing Equipment Management		Document #:	PROC-ENV-BELL-149
Author:	Amanda Gorman	Manager, Compliance Systems	Revision Date:	05-08-2015
Process Owner:	Simon Forget	Senior Manager, Environment	Revision #:	3.0

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1. Purpose

This procedure describes the required steps to manage residual materials that may contain polychlorinated biphenyls (PCBs) in buildings according to regulatory and client requirements

2. Scope

This procedure applies to BGIS Global Integrated Solutions Alberta LP (“BGIS”) line of business and when the activities identified are within the scope of services for Bell.

- This process applies to Bell and its subsidiaries.
- The procedure begins when equipment that may contain PCBs is put out of service until the elimination of these hazardous residual materials is complete.

3. Roles & Responsibilities

3.1. Facility Manager (FM)

- Verify potential presence of PCBs in equipment.
- Ensure that PCB containing materials management complies with regulatory requirements
- Consult with ES for deadlines, and communications protocol

3.2. Environmental Services (ES)

- Inform FM of upcoming deadlines, and support notification requirements
- Liaise with Bell CR&E for regulatory and client required documentation

4. Procedure

4.1 Instructions for the management of in use PCBs		
Steps	Actions to be performed	Owner
4.1.1	Verify the potential presence of PCBs. PCBs may be present in the following equipment: <ul style="list-style-type: none"> - Light ballasts; - Electrical transformers ; - Liquid containing electrical cables. PCBs can also be found in heat transfer systems, hydraulic systems, electromagnets, switches, voltage regulators and circuit breakers.	Facility Manager
4.1.2	When in doubt, ask that the equipment that may contain PCBs be tested prior to disposal. Retain the services of a specialist to sample and analyse the equipment.	Facility Manager
4.1.3	When equipment is not used anymore, refer to section 4.3 of this process for proper disposal.	Facility Manager

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4.2 Instructions for the management of out of use PCBs		
Steps	Actions to be performed	Owner
NOTE: Permanent storage is not permitted		
4.2.1	<p>For temporary storage (awaiting transfer), place a notice on the equipment that will follow this equipment until its destruction. The notice must meet the following criteria:</p> <ul style="list-style-type: none"> - Mentions “Attention! – Contains 50 mg/kg or more of PCBs /contient 50 mg/kg ou plus de BPC” in black letter on a white background and a minimum size of 36 points. - Be at least 150 mm by 150 mm in size and must be placed on a visible section of the accessible part of the equipment. <p>A similar notice must be placed at the entrance of the room, corridor or building where the equipment is temporarily stored.</p>	Facility Manager
4.2.2	Quickly coordinate the disposal of PCB containing equipment that are out of service (see Section 4.3).	Facility Manager

4.3 Instructions for PCB disposal		
Steps	Actions to be performed	Owner
4.3.1 Centralized management of PCBs		
4.3.1.1	Confirm the presence of PCBs in the equipment to be sent for disposal. When in doubt or when possible, adequately package the material.	Facility Manager
4.3.1.2	Contact the Hazardous Material Recovery Centre (HMRC) coordinator at 450-629-6090. Coordinate transportation to the HMRC at 3000 Boul. Industriel in Laval, Quebec.	Facility Manager

4.3.2 Local management of PCBs		
4.3.2.1	If the HMRC cannot receive residual materials containing PCBs, manage PCBs disposal with local suppliers.	Facility Manager

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4.3.2.2	Find a carrier and a disposal company certified in accordance to provincial requirements. Coordinate transportation and disposal of PCBs with selected suppliers.	Facility Manager
4.3.2.3	Complete and sign the Waste Manifest.	Facility Manager
4.3.2.4	Ontario-specific requirements : Contact ES to obtain a registration number from the waste producer and the HWIN number, which must be indicated on the "Waste Manifest".	Facility Manager
4.3.2.5	When the waste comes from a new site that does not have a HWIN number, provide site information to the CR&E group to proceed with its registration.	ES
4.3.2.6	Ensure that the "Waste Manifest" is completed in compliance with the special requirements (see WI-ENV-BELL-340) and sign it.	Facility Manager
4.3.2.7	Obtain the Waste Manifest and the Disposal Certificate. Forward these documents to ES.	Facility Manager
4.3.2.8	When PCB containing materials are sent to a local transfer site or directly to a disposal site, provide to ES: <ul style="list-style-type: none"> - PCB concentration in oil (mg/kg); - Total quantity of PCBs (L or kg); - Transfer dates (to transfer site and disposal site) - Destruction date; - Name of transfer site and/or disposal site; - Quantity of destroyed PCB containing materials (in kg). <p>Note: According to the regulation, transfer sites have one year to send their waste to an approved disposal site. These disposal sites also have one year to proceed with the destruction of their stock. A maximum delay of 2 years may be required to obtain the certificate of disposal.</p>	Facility Manager
4.3.2.9	Complete the Summary table of hazardous materials generated (FRM-ENV-BELL-339) and indicate the quantities of disposed PCBs. Forward the table and the Disposal Certificate to ES.	Facility Manager
4.3.2.10	At the end of the year, send a reminder to Facility managers to ensure that they report the quantity of PCBs containing materials that were disposed of during the year and that have not yet been reported.	ES

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4.3.2.11	Consolidate all the received data in a single table.	ES
4.3.2.12	Forward the table of PCBs containing materials that were disposed of during the year to the Bell CR&E responsible person.	ES

5. Definitions

Hazardous Material

- Item or agent (biological, chemical, physical) which has the potential to cause harm to humans, animals or the environment, either by itself or through interaction with other factors.

Polychlorinated biphenyls (PCB)

- Any industrial compound produced by biphenyl chlorination, considered as very dangerous for the environment due to its persistence in the nature, of its toxicity and its ability to accumulate in the food web, resulting in pathogenic and teratogenic effects.

Residual Hazardous Material

- Hazardous material that is wasted, used or outdated, as well as any other hazardous material named in the applicable hazardous materials regulations. Also known as hazardous waste.

6. References

- 1) WI-ENV-BELL-311: Generic Definitions for Environmental Procedures
- 2) Bell ENV 018 Hazardous Materials Management
- 3) Bell ENV 034 Management of Residual Materials (Central Offices)
- 4) PROC-ENV-BELL-142 Hazardous Residual Material Management
- 5) FRM-ENV-BELL-339 - Hazmat report form - Formulaire de disposition des matières dangereuses
- 6) WI-ENV-BELL-340 - Hazardous Material - Waste Manifest Memo
- 7) PROC--ENV-BELL-127 - Environmental Incident Response

7. Records

Record Name	Form Number	Data Classification	Record Owner	Record Location	Minimum Retention Time
Waste Manifest and disposal certificate	FRM-ENV-BELL-339	Confidential	ES	Clientconnect	10 years
Summary table of generated hazardous Materials	FRM-ENV-BELL-339	Confidential	ES	Clientconnect	10 years

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8. Revision/Review History

Version No.	Date	Document Approver	Summary of Change(s)
1.0	04-09-2013	Sr. Director, Performance Management	Original
2.0	01-04-2015	Sr. Director, Environment	Updated document to meet new formatting standards
3.0	08-05-2015	Sr. Manager, Environment	Updated numbering, updated cross references to other documents; general clean up of procedure

9. Flowchart

Not applicable