

CURRENT BEST PRACTICES FOR PCBs IN CAULK FACT SHEET
Removal and Clean-Up of PCBs in Caulk and PCB-Contaminated Soil and Building Material

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PCBs in caulk

EPA has learned that caulk containing polychlorinated biphenyls (PCBs) was used in many buildings, including schools, during building construction, renovation, or repair from the 1950s through the late 1970s.

This fact sheet identifies for school system officials key information on removal and cleanup of PCBs in caulk and PCB contaminated soil and building material.

In addition, this fact sheet identifies who to contact at EPA for advice on addressing PCBs in caulk.

PCBs were not added to caulk after 1978. Therefore in general, schools built after 1978 do not contain PCBs in caulk. To date it has been found in buildings in the Northeast and Upper Midwest and in joints in concrete water storage basins in the western United States. Activities to address PCBs in caulk are underway in these areas. EPA is encouraging greater awareness of this issue so people can take steps to minimize potential exposure.

Exposure to PCBs can cause a variety of adverse health effects in animals and humans. PCBs have been shown to cause cancer in animals, as well as a number of serious non-cancer health effects, including effects on the immune system, reproductive system, nervous system, endocrine system and other health effects. In humans PCBs are potentially cancer-causing and can cause other non-cancer effects as well. For more information on the health effects of PCBs, go to <http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/effects.htm>.

As part of EPA's overall effort to provide guidance to building owners concerning PCB containing caulk in buildings, EPA has produced three other fact sheets and a brochure that address PCBs in caulk. These fact sheets can be found on EPA's website at www.epa.gov/pcbsincaulk.

Cleanup requirements

Caulk containing PCBs at levels greater than or equal to (\geq) 50 parts per million (ppm) is not authorized for use under the PCB regulations and must be removed. Although you are not required to remove caulk containing PCBs at levels below 50 ppm, you may wish to because the caulk may present health risks depending on the location, condition, etc. PCBs in caulk are known to contaminate adjacent building material (e.g., masonry, wood, concrete) and soil surrounding the building. Therefore, any surrounding building material that is contaminated by \geq 50 ppm PCB-containing caulk, such as through leaching of PCBs, must be cleaned up. Safely removing the PCB-containing caulk, while preventing further contamination and cleaning up surrounding materials, should be the focus of cleanup projects.

Removal of PCB-containing caulk and contaminated soil and building material

When removing caulk and surrounding building material that are known or suspected to contain PCBs, it is important to manage the removal in a way that minimizes workers' exposure to the PCBs (e.g., uses protective clothing such as facemasks, gloves, etc.) and prevents the release of PCBs into the environment.

Caulk: Caulk containing PCBs at concentrations ≥ 50 ppm is not authorized for use and must be removed and properly disposed. When disposed, the caulk must be managed as *PCB bulk product waste*, defined at 40 CFR § 761.3. Regulations governing the cleanup and disposal of *PCB bulk product waste* are provided at 40 CFR § 761.62. You must remove all caulk containing PCBs at concentrations ≥ 50 ppm unless otherwise approved by EPA under a risk-based disposal approval issued under 40 CFR § 761.62(c).

Building Materials: Materials (e.g. concrete, brick) that are coated with PCB-containing caulk at concentrations ≥ 50 ppm must be managed as *PCB bulk product waste*, with the same requirements as the ≥ 50 ppm PCB-containing caulk. Additionally, building materials that have been contaminated by ≥ 50 ppm PCB-containing caulk, such as through leaching of PCBs, as well as any soils contaminated with PCBs from the caulk, also must be cleaned up. Generally, these materials must be treated as *PCB remediation waste*, defined at 40 CFR § 761.3. Regulations governing the cleanup and disposal of *PCB remediation waste* are provided at 40 CFR 761.61. The requirements in this section vary depending on the type of building material that contains the PCBs (i.e., porous or non-porous) and the potential exposure levels remaining after cleanup is completed, among other things.

EPA is helping to address the issue of PCBs in caulk

EPA is conducting research on how the public is exposed to PCBs in caulk and on the best approaches for reducing exposure and potential risks associated with PCBs in caulk. Where PCBs have been found in the air, soil or in the caulk and other building materials, EPA is committed to helping schools and communities enact plans to reduce exposure. Please contact your regional PCB coordinator at 888-835-5372 for help with assessing contamination and exposure and developing cleanup plans.

Ask EPA experts for help addressing PCBs in caulk

For further information on cleanup and removal of PCB caulk, contact EPA's PCBs in Caulk hotline at 888-835-5372 or the Regional PCB Coordinator for your area.

Find the PCB coordinator for your state at
www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/coordin.htm.

This fact sheet is intended solely for guidance and should be used as an informal reference. It does not replace or supplant the requirements of the Toxic Substances Control Act or the PCB regulations at 40 C.F.R. part 761, and it is not binding on the Agency or individuals. Please refer

to the regulations at 40 C.F.R. part 761 for specific requirements relating to PCBs and PCB-containing materials.