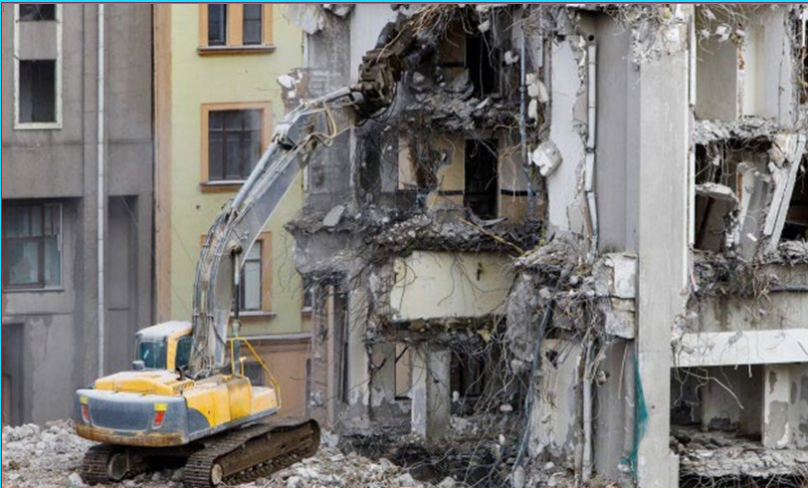
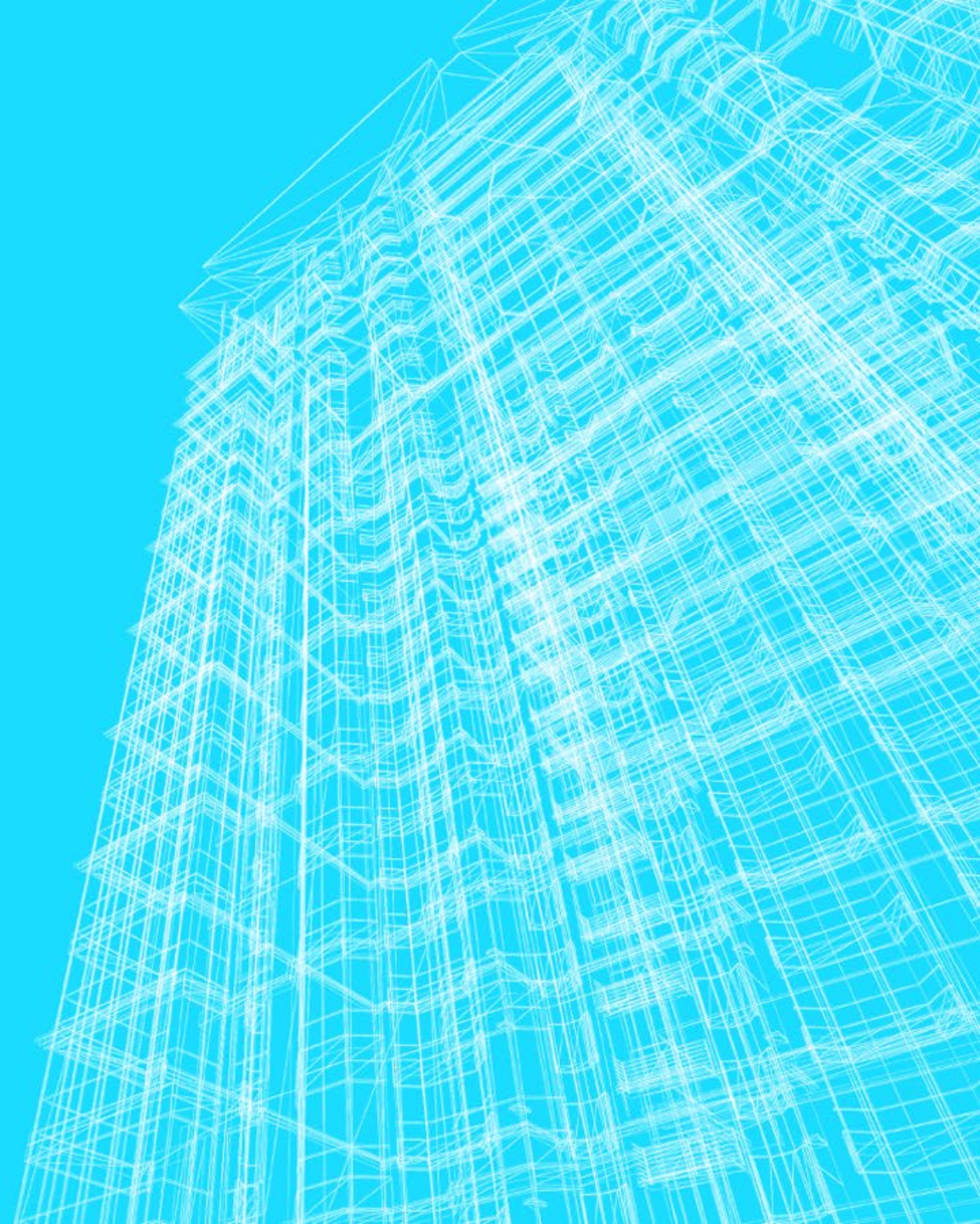


DEMOLITION OF BUILDINGS WITH PCBS

A very brief five-minute introduction!



Steven Armann
PCB Cleanup Program Manager,
EPA Region 9
415-972-3352
Armann.Steve@epa.gov



COMMON PCBS IN BUILDING MATERIALS FROM 1950 TO 1980

PCB BULK PRODUCTS

- Caulk
- Paint
- Adhesives / Mastic
- Floor Finishings
- Ceiling Tiles
- Galbestos Panels
- FLBs and other high intensity lamps
- Insulation
- Coal Tar type coatings (water tanks and pipes)

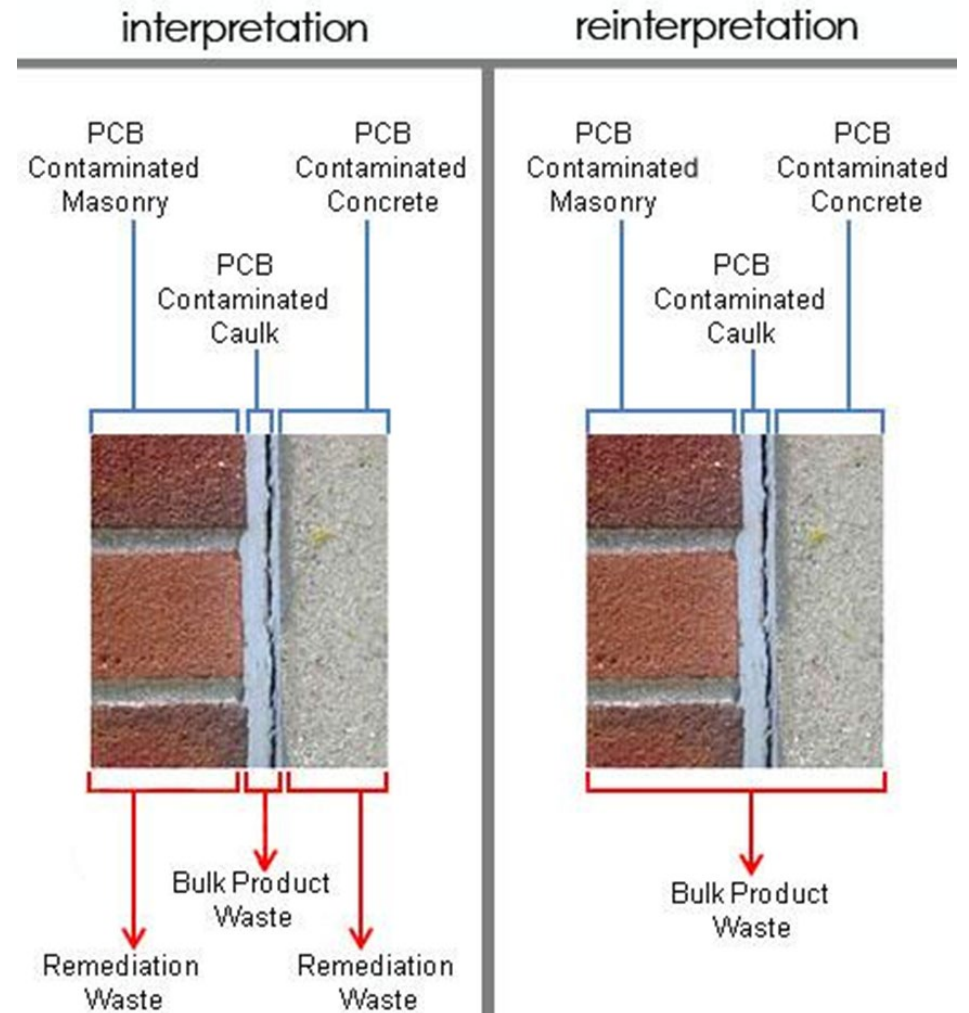


GENERAL REGULATORY REQUIREMENTS

- **PCB Bulk Product Waste** – Non liquid wastes derived from manufactured products containing PCBs equal to or greater than 50 ppm (40 CFR 761.3)
- **PCB Remediation Waste** – PCB contamination due to spills or releases from PCB containing material (40 CFR 761.3) *building substrate when PCBs leached from BP.
- **Disposal of PCB Bulk Products** – Municipal landfill w/o EPA approval (exception in California where it's a hazardous waste) (40- CFR 761.62(b))
- **Disposal of PCB Remediation Waste** – a) w/o EPA approval to a TSCA permitting facility (4- CFR 761.61(b)); b) With a notification or approval from EPA – less than 50 to a MSWLF and higher; greater than 50 to a HW landfill and higher.

PCB BULK PRODUCT REINTERPRETATION

- **EPA's Reinterpretation of PCB Bulk Product Waste** - Allows removal and disposal of PCB Bulk Product and attached substrate as Bulk Product Waste (EPA Policy Memo – October 24, 2012).
- Must designate disposal approach before removing materials
- Allows for disposal of combined material in a municipal landfill (except in California).





DISCLAIMER AND RESOURCES

- This presentation was a very general overview of requirements for PCBs in buildings. Don't rely on this as the definitive resource.
- Other resources.
- 40 CFR 761.60
- <https://www.epa.gov/pcbs/polychlorinated-biphenyls-pcbs-building-materials>
- <https://www.epa.gov/pcbs/pcb-facility-approval-streamlining-toolbox-fast-streamlining-cleanup-approval-process>