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Revised Date: August 14th, 2018
Department of Administrative Services / Construction Services
Supersedes DCS PCBs in Caulk Policy, September 17th, 2014
Authority: Code of Federal Regulations, Title 40, Part 761.

PCB's in Caulk

Summary Statement:

This policy is to establish uniform criteria for compliance with the United States Environmental Protection Agency (EPA) and the State Department of Energy and Environmental Protection (DEEP) concerning Polychlorinated biphenyls (PCBs).

Scope:

These guidelines are applicable for all demolition, renovation and/or repair projects administered by the State Department of Administrative Services / Construction Services (henceforth, the "Department") and State Agency Administered construction projects receiving State funding.

Background:

The EPA has learned that caulk products that were used in many buildings during construction, renovation, or repair projects from the 1950s through the late 1970s may contain PCBs. PCBs were often added to caulk products to enhance flexibility of the caulk. PCBs are federally regulated by the EPA in Part 761 of Title 40 of the Code of Federal Regulations (CFR), promulgated under section 6(e) of the Toxic Substances Control Act (TSCA) and are regulated by the State DEEP in Sections 22a-463 through 469 of the Connecticut General Statutes (CGS).

Caulk Products. According to the EPA, caulk products (including glazing) containing PCBs at concentrations greater than or equal to (\geq) 50 parts per million (ppm) are not authorized for use and must be removed and properly disposed of as PCB Bulk Product Waste as defined in 40 CFR 761.3.

If PCBs are detected in caulk products at concentrations between 1 ppm and 50 ppm, and the caulk products meet the definition of a PCB Excluded Product, as defined in 40 CFR 761.3, then DEEP considers this an unauthorized use that requires removal.

Adjacent Porous Building Materials and Soils. Adjacent porous building materials (e.g., brick, cinder block, concrete, and wood) may contain PCBs if the materials were coated with \geq 50 ppm PCB containing caulk. According to the EPA, if PCBs are present in these materials as a result of the subject caulk and at concentrations \geq 1 ppm, and are removed at the same time as the caulk, then those materials are considered PCB Bulk Product Waste per the EPA PCB Bulk Product Reinterpretation Decision (October 24, 2012). Soils beneath with \geq 50 ppm PCB containing caulk may also contain PCBs.

Policy and Procedure:

To determine the applicability and best course of action of whether to test for PCBs in caulk or other building material, answer the following questions:

1. Will the project disturb any existing caulk products as part of the project? ☐ Yes ☐ No
2. Was the building constructed/renovated/repared between 1950 and 1979? ☐ Yes ☐ No
3. Has the caulk or glazing been renovated/replaced since 1979? ☐ Yes ☐ No

If the answer to either of the first two questions is yes, then contact the Department's Chief Architect (860) 713-5631. If the answer is yes to question 3, or no to either question 1 or 2, then no PCB testing is warranted.

The Department's Environmental Planning Unit can recommend solutions and options to assist with PCBs in building material based on the particular circumstances of the project, or agency. For state capital projects and projects administered by the Department, the Department's Environmental Planning Unit must be involved to assist with PCBs in building material and interaction with regulatory agencies and consultants. For agency administered projects, agencies should feel free to contact the Department's Environmental Planning Unit to assist with providing guidance.

For questions, please contact the Department's Chief Architect at (860) 713-5631.

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