



PCBs IN CAULK

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The United States Environmental Protection Agency (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 polychlorinated biphenyls (PCBs). PCBs were often added to caulk products to enhance flexibility of the caulk. PCBs are Federally regulated by 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).

Caulk Products. According to EPA, caulk products containing PCBs at concentrations greater than or equal to 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 the Connecticut Department of Environmental Protection (DEP) recommends that the caulk products be removed.

Adjacent Porous Building Materials and Soils. Adjacent porous building materials (e.g., brick, cinder block, concrete, wood) that were coated with ≥ 50 ppm PCB-containing caulk may contain PCBs. In addition, soils beneath ≥ 50 ppm PCB-containing caulk may contain PCBs. According to the EPA, if PCBs are present in these materials as a result of the subject caulk and at concentrations greater than or equal to 1 ppm, then EPA considers the materials as PCB Remediation Waste as defined in 40 CFR 761.3 and must be removed and properly disposed of.

For projects administered by the Connecticut Department of Public Works (DPW) or agency administered projects, DPW recommends applying the following screening questions to all current and future renovation and/or repair projects:

Will the project disturb any existing caulk products as part of the project? Yes No

Was the building constructed/renovated/repared between 1950 and 1978? Yes No

- If the answer to both questions is no, then DPW recommends proceeding as normal.
- If you answer yes to either of these questions, contact DPW Environmental Planning at 860-713-5762.

As each project and agency circumstances vary, DPW Environmental Planning can discuss solutions and options for the project, including assistance with testing for PCBs in building material and interaction with regulatory agencies and consultants. Agencies should feel free to contact DPW Environmental Planning to assist with providing guidance to Consultants.