

	Polychlorinated Biphenyls (PCBs) Site Assessment Testing Policy	Document Number: ES 101
		Effective Date: March 2009
		Revision Date:

1.0 Purpose and Applicability

- 1.1 Due to the hazardous nature of PCBs it is required that testing of caulking and sealants for PCBs be included as part of the hazardous materials site assessment protocol process. PCBs have significant human health effects including being a suspect carcinogen. Regulatory agencies such as state department of environmental protection and US EPA have regulatory requirements related to PCBs.
- 1.2 Sampling and analysis testing should precede any alteration, renovation or demolition project involving campus buildings constructed between 1950 and 1977. If testing results reveal PCB levels in excess of 50 parts per million, specific actions under TSCA for disposal and an overall action plan must be developed and approved by EHS before work commences.

2.0 Definitions

- 2.1 PCBs – Polychlorinated biphenyls are a class of 209 organic compounds
- 2.2 Carcinogenic – Cancer causing agents
- 2.3 TSCA - Toxic Substance Control Act

3.0 Roles and Responsibilities

3.1 Key Personnel –

- 3.1.1 **EHS** – Primary responsibility for facilitating and interpreting PCB test results rests with EHS
- 3.1.2 **FCP** – Will assure that all projects under their control will adhere to this policy and any PCB sampling and test results will be vetted through EHS
- 3.1.3 **PP** - Will assure that all projects under their control will adhere to this policy and any PCB sampling and test results will be vetted through EHS
- 3.1.4 **Testing Companies** – Any contractor retained to do any PCB related testing will coordinate with EHS and will not contact any regulatory agency without the consent of EHS.

4.0 Procedure

- 4.1 Prior to commencing any work on a building involving the disturbance of caulking or other joint compounds in building built between 1950 and 1977, EHS will be contacted for guidance
- 4.2 EHS will determine if testing for PCB should be included in the site assessment process along with other site assessment requirements.
- 4.3 EHS will provide guidance on contractors that are qualified to test for PCBs and all test results will be vetted through EHS before any work commences. If any of the tests disclose PCB levels in excess of 50 ppm then an action plan should be developed and approved by a qualified industrial hygiene contractor.

4.4 All resultant waste will be disposed of in accordance with TSCA requirements and so documented.

5.0 Key References

5.1 Code of Federal Regulation 40CFR S761.20(a)(1)

5.2 TSCA