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EPA issues new PCB disposal guidance

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EPA recently issued a reinterpretation regarding the disposal of Polychlorinated Biphenyl (PCB) contaminated building materials: PCB Bulk Product Waste Reinterpretation.

The reinterpretation is specifically addressing the definitions of bulk product waste (e.g., PCB contaminated caulk or paint) and remediation waste (e.g., PCB contaminated masonry or concrete). This distinction is important as it determines the appropriate cleanup requirements and disposal options. The reinterpretation being proposed in this notice would allow building material (i.e., substrate) "coated or serviced" with PCB bulk product waste (e.g., caulk, paint, mastics, sealants) at the time of disposal to be managed as a PCB bulk product waste, even if the PCBs have migrated from the overlying bulk product waste into the substrate.

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