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PCBs - How they effect your health and your wallet

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Did you know that every day building materials like caulking, glazing, paints and a variety of other commercial products used from 1950 until 1979 may contained a chemical that presents significant health risks and liability when not managed properly? PCBs (Polychlorinated biphenyls) are manmade chemicals historically used in the built environment in a way that is creating significant challenges to the demolition and redevelopment world.

In 1979, the EPA banned manufacturing PCBs and then began regulating the use and disposal of PCB-containing materials, under what is commonly known as TSCA. Several states, such as Connecticut, have also imposed additional regulations. The driving goal of these regulations is to control health risks related to PCB contaminated dust, debris and indoor air quality.

Meeting today's regulatory standards have brought on challenges which can be problematic, time consuming and costly. We have found that three major road blocks exist:

First - TSCA does not mandate testing for PCBs; yet proper disposal is required whether or not you know about the presence of PCBs. Also, not only are final disposal facilities heavily regulated, but leaving PCB impacted material in the built environment is considered "unauthorized use" and is not allowed without considerable on-going and long term maintenance responsibility.

Second - Regulations dealing with PCBs were not written with building materials in mind, they were written primarily for releases of liquids from such items as transformers and are therefore, very ambiguous.

Third - Disposal options are limited, costly and not located in New England.

Based on our experience, we have learned that the best way to manage the PCB issue is to plan in advance and create a successful management strategy that includes:

* Inventory of high risk structures and materials.
* Understanding their condition.
* Defining construction age, renovation or demolition plans, material condition, occupants and potential exposures.
* Selective sampling of suspect materials.
* No indoor air sampling without knowledge of all possible indoor sources of PCB
* Upfront planning for controlled removal.
* Carefully written contract documents.
* Conservative off-site disposal of impacted material.

Our approach to developing and implementing a management strategy begins with helping owners and developers understand the regulations and how to apply that knowledge to their project or to the group of buildings they manage. We plan first and sample only after we understand:

* How detection of certain levels of PCB will impact on planned work.
* Workers right-to-know about contamination they may be exposed to.

* Scopes of work needed to control exposures during and after the work.
* Disposal requirements for impacted materials.
* Likely impacts on project schedules and costs.

Project after project has proven that strong upfront planning and management enables owners to control liability and compliance, while controlling costs and negative impacts on project schedules. This strategy will keep your demolition or renovation project just that and not a PCB abatement project with a life of its own.

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