



## Our Projects

Our Projects

Habitat Restoration

Fish & Wildlife Recovery

Water Quality Improvement

Watershed Management

Stewardship

State of the Estuary Conference

## Project Map



## PCBs in Caulk Project

PCBs—polychlorinated biphenyls—are a probable human carcinogen and may be causing reproductive failure in birds and affecting immune response in harbor seals in the Estuary. SFEP's PCBs in Caulk Project was created to address potential impacts of polychlorinated biphenyls (PCBs) in caulks and sealants released into stormwater runoff during demolition or remodeling projects in the San Francisco Bay Area. The project is assisting the implementation of the Total Maximum Daily Load (TMDL) for PCBs in San Francisco Bay. The PCBs TMDL includes a plan for reducing PCBs loads that is implemented through permits, including the Municipal Regional National Pollutant Discharge Elimination System (NPDES) Permit for Stormwater (MRP). In the first five-year permit term, starting in 2009, stormwater Permittees are required to investigate the costs, effectiveness, and technical feasibility of several categories of potential PCBs control measures. The PCBs in Caulk Project focused on one such category of potential PCBs controls: measures to minimize the release of PCBs in caulks and sealants to stormwater runoff during demolition or remodeling projects.

The grant-funded PCBs in Caulk Project concluded at the end of 2011.

## UPDATE: EPA Proposes Reinterpretation PCBs in Caulk Regulations

Since the SFEP PCBs in Caulk materials were published, EPA issued a notice of proposed rulemaking soliciting comment on how PCBs in caulk were treated under EPA regulations. After consideration of those comments, EPA has proposed a reinterpretation of what materials are considered PCB bulk product waste versus PCB remediation waste. See fuller information at <http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/reinterpret.htm>

## Final Report on PCBs in Bay Area Buildings – Sampling Results and Estimate of Loadings to SF Bay

- [Report: Estimated Stock in Currently Standing Buildings and Releases to Stormwater during Renovation and Demolition](#) by San Francisco Estuary Institute (SFEI), 2011.
- Supporting documents:
  1. [Calculations of mass estimates](#)
  2. [Calculations of demolition and renovation releases](#)

## Model Regulatory Program

Disclaimer: To the extent that Permittees will be required in future permits to control PCBs in caulks and sealants released during building demolition or remodeling, these documents are intended to assist in complying with such requirements. **At the time of publication (2011), municipalities are not required to implement the BMPs or Model Implementation Process.**

- [Best Management Practices](#) to control PCBs in caulk at demolition or renovation.
- [Model Implementation Process](#) to incorporate requirement to use BMPs into municipal demolition permitting process. This document breaks new ground as the first known attempt to create a potential regional regulatory process to manage PCBs in caulks and sealants to protect water quality. It also leaves many issues for potential future implementers to address, compiled in Appendix A of this document on Obstacles, Challenges, and Future Needs.

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- [Training Strategy](#) to train and deploy municipal staff, such as hazardous material or building inspectors, to ensure proper implementation of the BMPs and compliance with the program. This is a supplement to the MIP.
- *The BMPs, MIP, and Training Strategy were authored by Larry Walker Associates, Inc., Geosyntec Inc., and TDC Environmental, LLC in November, 2011.*
- [Technical Memorandum](#) on existing regulatory controls and policies related to managing wastes and hazardous materials during building demolition and/or remodeling programs.
- *Please see also the Resources section at the bottom of this page for additional related materials.*

### **Workshop Held 7/26/11 to Test New Regulatory Process Adding PCB Control to Demolition Permitting**

Who: Municipal staff with responsibility for demolition permitting

When: Tuesday, July 26, 1:00pm to 5:00pm

Where: Menlo Parks Arillaga Family Recreation Center, 700 Alma Street (Juniper Room) [Workshop invitation](#)

### **Requests for Participation in Sampling and Implementation Trial Elements of the Project**

[Request for Participation – Sampling Element](#)

[Request for Participation – Implementation Trials Element](#) (for municipalities)

[Request for Participation – Implementation Trials Element](#) (for non-municipal agencies and organizations)

### **2nd Stakeholder Meeting, October 26, 2010, Oakland**

The project's second stakeholder meeting provided an opportunity to review a draft management procedure for PCBs in caulk at demolition/renovation. The authors described and solicited feedback on draft Best Management Practices, an implementation guide, and training materials. Discussion centered on the theme: "how would these documents work for your agency?"

Physical meeting location: 1515 Clay Street in Oakland, Room 1411 with call-in available.

Materials:

[Meeting Invite Flyer and Agenda](#)

[Presentation 1 \(SFEP Overview\)](#)

[Presentation 2 \(LWA and Geosyntec\)](#)

### **1st Stakeholder Meeting, July 15, 2010, Oakland**

A team of municipalities, scientists, and stormwater quality managers are developing a process to manage PCBs in caulk. The management process is intended to protect San Francisco Bay from PCBs in caulk released when buildings are demolished or renovated. Developing best management practices (BMPs) and a process to implement those BMPs is required under the new municipal stormwater permit.

This stakeholder meeting introduced the project and identify opportunities to provide feedback into the development of the BMPs and implementation process. We are seeking input from a variety of sectors which may find this project relevant, including: Construction/demolition managers, contractors, building industry associations; Air/water/waste regulators; Public health and safety; Environmental remediation specialists; Municipal permitting, community development, public works departments; and Building managers or facilities managers.

The meeting was held at Joseph P. Bort MetroCenter Auditorium, 101-8th Street, Oakland (Lake Merritt BART) on Thursday, July 15 from 1-4pm.

SFEP presentation, [Details of Grant Support](#)

LWA presentation, [Developing a Process to Manage PCBs in Caulk During](#)

## Building Demolition/Renovation in the Bay Area

## Invite Flyer

**CLOSED: RFP for PCBs in Caulk BMPs Development**

The RFP was posted March 4, 2010, and closed April 2 at 5:00pm. The San Francisco Estuary Partnership (SFEP), a project of the Association of Bay Area Governments (ABAG), a joint powers agency, formed under California Government Code Sections 6500, et seq., invites qualified organizations (such as a consultant or team of consultants) to respond to this Request for Proposals (RFP) for developing Best Management Practices (BMPs) to reduce or prevent discharge of polychlorinated biphenyls (PCBs) from release during building demolition/remodeling, as part of the PCBs in Caulk project managed by SFEP. This project is funded by the State Revolving Fund under the American Recovery and Reinvestment Act of 2009 (ARRA) and is subject to federal stimulus terms and conditions. Proposals were due April 2, 2010 at 5:00pm.

**Archive of RFP-related materials**

- [RFP](#) posted March 4, 2010
- [Proposal/references forms](#) in Word
- ABAG/ARRA [contract provisions](#)

**Resources**

- [Cleaning up PCBs in San Francisco Bay](#), a fact sheet by the San Francisco Regional Water Quality Control Board
- PCBs in Caulk Project [Request for Participation](#) (2009)
  - Overall Project [Fact Sheet](#) (2008)
  - [Sampling Methods](#) Fact Sheet (2008)
- Clean Estuary Partnership memo 7/16/2007, [Re: First Phase Support Information for PCB Portion of Taking Action for Clean Water Grant](#)
- This project is required under the San Francisco Regional Water Board's Municipal Regional Stormwater NPDES Permit (MRP), section C.12.b.
  - Section C.12.b [alone](#) or [with background material](#) (Water Board's PCBs Fact Sheet)
  - [Full MRP](#) (section C.12.b is on page 95).
- EPA's [PCBs in Caulk in Older Buildings](#) page
- [Treatment technology](#) to extract and destroy PCBs (powerpoint by Tom Krug, Geosyntec)

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Association of  
Bay Area Governments

