

<b>Title: Removal of PCB containing caulking from University buildings</b>	<b>Document No.:</b> CH-021-A
	<b>Revision No.:</b> 00 <b>Date:</b> 1-12-07
<b>Approved By:</b> Al Swavy	

1.0 **Purpose:** Provide guidance on the safe removal of PCB containing window caulking and to ensure all applicable OSHA, NYSDEC and USEPA regulations concerning PCB disposal are followed. In addition to PCBs, the caulk may or may not contain asbestos. This policy will primarily focus on caulk placed on buildings prior to 1980.

2.0 **Scope:** All employees, contractors and subcontractors employed by the University at Buffalo, the Dormitory Authority of New York State (DASNY), and the State University Construction Fund (SUCF) will comply with this policy and procedure. Other entities or agencies may be added as the need arises.

3.0 **Applicable Codes and Guidelines:**

- 3.1 USEPA Code of Federal Regulations 40 CFR Part 761
- 3.2 New York State Department of Environmental Conservation 6NYCRR Part 370
- 3.3 NYS Department of Labor 12NYCRR Part 56 (Code Rule 56 – Asbestos)
- 3.4 OSHA Code of Federal Regulations 29 CFR 1926.1101 (asbestos standards)

4.0 **Responsibilities:**

4.1 State agencies, contractors and subcontractors: All persons employed by various state agencies, their contractors and subcontractors who are performing any work which would fall under the direction of this policy are expected to follow the procedures outlined therein. It is expected that they will attend any PCB/asbestos awareness training given by the staff of the University’s Environment, Health and Safety Dept. (EH&S).

4.2 University at Buffalo Environment Health and Safety: UB EH&S will provide PCB/asbestos awareness training when needed. They will also advise concerning the proper disposal of the waste caulk once it is removed from the exterior of the building. Upon request EHS will also provide information on the hazards involved performing activities which would fall under the procedures outlined in this policy.

5.0 **Definitions:**

5.1 Polychlorinated biphenyls (PCBs) PCBs are a group of man made compounds which were developed in the 1930s and were mainly used in the electricity supply industry. They were also added to many consumer and industrial products. Their manufacture was banned in 1977 due to health concerns.

5.2 Asbestos containing material (ACM) Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals. If >1% asbestos is found to be present, the substance is said to be an asbestos containing material (ACM).

6.0 **Procedures:** The procedures outlined here will be dependant on results of PCB analysis and asbestos testing to be performed prior to any caulk being removed from the building.

6.1 **If caulk is not an asbestos containing material (ACM);** it shall be managed in the following manner depending on the level of PCBs detected.

6.1.1 PCB level 0-25 ppm. No personal protective equipment is required. A drop cloth is to be placed on the interior area around the window. At the

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end of the work shift, the caulk and plastic are to be placed in a 5 gallon pail labeled as containing PCBs <50 ppm.

- 6.1.2 PCB level 25-50 ppm. The following PPE will be required; tyvek suit, booties, and double gloves. A plastic drop cloth shall be placed over the entire working area which will minimize residual PCB contamination. Additionally, a drop cloth is to be placed on the interior area around the window. At the end of the work shift, the plastic is to be combined with the caulk in a plastic pail labeled as containing PCBs <50 ppm.
- 6.1.3 PCB level >50 ppm. The following PPE will be required; tyvek suit, booties, double gloves, half face respirator with an organic vapor cartridge. A plastic drop cloth shall be placed over the entire working area which will minimize residual PCB contamination. Additionally, a drop cloth is to be placed on the interior area around the window. Another plastic drop cloth shall be placed on the ground directly below the work area to catch any caulk which may fall. At the end of the work shift, the plastic is to be combined with the caulk in a 5 gallon pail and labeled as containing PCBs >50 ppm.
- 6.1.4 Once the caulk and any residual materials have been collected and the pails are properly labeled, contact UB Environment Health and Safety for guidance on the proper disposal of the caulk waste.

**6.2 If caulk is found to have asbestos containing material as well as PCBs);** it shall be initially managed as an asbestos abatement project in accordance with the applicable sections of Code Rule 56.

- 6.2.1 If the caulk is < 50 ppm PCBs, the waste will be managed as asbestos containing material
- 6.2.2 If the caulk is > 50 ppm, the waste will be managed as PCB waste.
- 6.2.3 Once the caulk and any residual materials have been collected and the containers are properly labeled, contact UB Environment Health and Safety for guidance on the proper disposal of the caulk waste.

7.0 Document Management: This procedure shall be reviewed once every two years, or as changes require.

8.0 Associated UB Documents:

8.1 *Campus Commitment to Safety*, University at Buffalo, Office of the Provost, Office of the Senior Vice President, April 3, 2001.

9.0 Document Revision History:

Revision	Section(s) Changed	Change(s) Made:	Date
00			

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