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Dr. Mr. Simons:

The Directors of the Waste Site Cleanup Programs of the New England states prepared the following comments through the Northeast Waste Management Officials' Association (NEWMOA) on EPA's "PCBs in Caulk in Older Buildings" webpage (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/index.htm) in response to Lynn Vendinello's July 8, 2011 letter requesting comments.

PCBs encountered in building materials during renovation is a troubling problem for the Northeast states, and we appreciate the time and effort that EPA has expended in compiling relevant information on the topic on the webpage. Overall, we find the information regarding renovating buildings that contain PCB materials useful. However, since EPA has expanded the PCB-related information available on the webpage (www.epa.gov/epawaste/hazard/tsd/pcbs/index.htm), there is now repetition, and navigating to crucial pieces of information on a given topic is more difficult. The links on the "PCBs in Caulk in Older Buildings" webpage go to other webpages that have several links, each going to pages with more links. In addition, important information is sometimes left out of a section, page, or factsheet so a user can miss key information if they do not click through and read a considerable amount of repetitive material.

NEWMOA offers the following comments to improve the accessibility and content of this important EPA webpage:

1. The flowchart at:

(www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/index.htm#flowchart) is extremely helpful and should be elevated to a higher level because it provides a clear summary of all of the complex information. By making the webpage, "Steps to Safe Renovation ..." –

(www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/index.htm#overview) a

higher level or central distribution point, the flowchart will no longer be buried and hard to find. The flowchart would need to be updated, including adding working links to the webpages referenced in the blue boxes.

2. EPA's guidance on its webpages should be clearer that once a bulk material is tested, if the results show that it contains equal to or above 50 ppm for PCBs, then abatement must occur. EPA should recommend that before bulk testing begins, the building's owner should develop a conceptual plan on how to address removal of unapproved TSCA materials if they are found, including an adequate budget. For example, these points are needed on the "EPA Fact Sheet – PCBs in Caulk" (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/caulk-fs.pdf) and the "PCBs in Caulk – QA" (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/caulk-faqs.pdf) documents linked on the "PCBs in Caulk in Older Buildings" webpage. EPA also needs to be clear about whether there is a deadline for the removal of the caulk if the test results are positive and whether there is a uniform deadline (e.g., 18 months from the sample date).
3. We strongly agree with EPA's guidance that the most appropriate approach for addressing older buildings is to first sample the air for PCBs to see if there is any existing risk rather than directly sampling the bulk materials. However, the webpages need to emphasize that contact threats could exist even if no air contamination is found and should recommend conducting a wipe test (unless the Agency thinks that this is not a reliable test). If the building owner finds that no current risk exists, the guidance should recommend that they conduct bulk testing of caulk, ballasts, paints, or other suspect materials in the future if renovations are undertaken for other reasons, such as weatherization or building rehabilitation.
4. The webpage does not contain information on whether or not encapsulation with paint or epoxy is an effective and acceptable interim measure to mitigate risks in occupied buildings. If EPA has data on this one way or the other, that would be useful information to publish on the webpage.
5. All health effects and guidance levels should appear on one page (e.g., the air guidance at: www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/maxconcentrations.htm should be moved to the "Health Effects of PCBs" page at www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/effects.htm). Other pages could be linked to this webpage, thereby ensuring that all pages have the most current information.
6. In the spirit of enhancing EPA's numerous webpages, factsheets, and brochures that contain excellent information relating to renovation and abatement, but where the

message is diluted and confused by partial redundancy, we offer the following recommendations. The new information on your “PCBs in Caulk in Older Buildings” webpage should be a subset, or lower level, of a general “Renovation of Buildings Containing PCBs” topic. The webpages that should be consolidated are:

- a. “Steps to Safe Renovation and Abatement of Buildings That Have PCB-Containing Caulk”
(www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/index.htm#overview) should become the launching site for other webpages related to how to renovate buildings containing PCBs.
 - i. The title should be changed to: “Steps to Safe Renovation and Abatement of Buildings That Have PCB-Containing Materials”.
 - ii. A link should be added to this page at the left-hand side-bar on the PCB templates, so that it becomes the central distribution point for the topic, and a prominent link should be added from the “Interpretive Guidance” webpage (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/guidance.htm).
 - iii. “Abatement Step 2: Conduct Removal and Abatement Activities” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-sect4b.htm) is very good but dense. As a future project, bolded headings and / or bulleted outlines of the information would make it easier to skim and read. However, the detail is necessary for preventing costly mistakes.
 - iv. At the end of this new “Renovation of Buildings Containing PCBs” page, there should be a link to information on current EPA research (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/caulkresearch.htm).
 - b. Current and relevant information from the old “Facts About PCBs in Caulk” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-sect1.htm) should be incorporated into the new “PCBs in Caulk in Older Buildings” webpage, and the old “Facts” page should be removed. Specifically, relevant information is contained in:
 - i. “Why Were PCBs Used in Caulk?”
 - ii. “How Do I Determine if My Building May Have PCBs?”
 - iii. “How Can Exposure to PCBs Occur?”
7. “The Building Characterization and Sampling Plan” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-sect3.htm#plan) should contain a link to the types of products that may contain PCBs, via a link to the webpage: “Basic Information / Commercial Use of PCBs” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/about.htm), so the user will know to conduct a full inventory of possible PCB containing materials (i.e., caulk, light ballasts, and others) before developing a sampling plan.

- a. Cutting Oils should be added to the list of materials that contained PCBs on the “Commercial Use of PCBs” section of the “Basic Information” page at www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/about.htm.
- b. “PCB Testing Protocols” should be consolidated to one page, for easier updating. The new information on “Current Best Practices for PCBs in Caulk Fact Sheet - Testing in Buildings” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/caulktesting.htm) should be consolidated into “How to Test for PCBs and Characterize Suspect Materials” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-sect3.htm#plan) and then the “Current Best Practices...” page should be removed. Specifically, the following sample protocols from the “PCBs in Caulk in Older Buildings” webpage should be moved to the “How to Test...” webpage (and then the “PCBs in Caulk in Older Buildings” webpage should link to the “How to Test...” section of the “Steps” page) as follows:

For determining the presence of PCBs in indoor air, EPA has two approved methods:

- [Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air - Compendium Method TO-4A \(high air volume\) \(PDF\)](#) (53 pp, 665K)
- [Compendium of Methods for the Determination of Toxic Organic Compounds in Ambient Air - Compendium Method TO-10A \(low air volume\) \(PDF\)](#) (37 pp, 288K)

EPA recommends that deteriorating caulk be tested directly for the presence of PCBs and removed if PCBs are present at significant levels. The PCB regulations provide appropriate methods for testing. More information on these procedures can be found at:

- [Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846](#)
- [Wipe Sampling \(PDF\)](#) (31 pp, 86K)”

8. To provide information on occupational and public safety, the information on “Abatement Step 2: Conduct Removal and Abatement Activities” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-sect4b.htm#measures) is more appropriate and useful than the general information on these topics that are currently linked to from the “PCBs in Caulk in Older Buildings” webpage.
 - a. Specifically, on the new “Caulk” webpage, EPA should provide a link to “Protective Measures” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-sect4b.htm#protective) instead of “Preventing Exposure to PCBs in Caulking Material” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/caulkexposure.htm), which is too general to prevent costly mistakes.
 - b. The webpage “Contractors: Handling PCBs in Caulk During Renovation” (www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/caulkcontractors.htm) should link to “Protective Measures” ([4](http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-

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- [sect4b.htm#protective](#)), rather than the “[Be in compliance with occupational protection regulations for contractors](#)” (PDF) (2 pp, 286K); and
- c. The “Additional Information” section should link to “Steps to Safe Renovation and Abatement of Buildings That Have PCB-Containing Caulk” (as renamed per 5(a)(i) - [www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/index.htm#overview](#)), rather than the current links (below), because the existing links are too general to prevent costly mistakes:
- [Preventing Exposure to PCBs in Caulking Material](#) || [PDF version](#) (2 pp, 2.7MB)
 - [Fact Sheet: Testing for PCBs in Caulk in Buildings](#) || [PDF version](#) (3 pp, 33K)
 - [Fact Sheet: Interim Measures for Reducing Risk and Taking Action to Reduce Exposures](#) || [PDF version](#) (4 pp, 45K)
 - [Fact Sheet: Removal and Clean-Up of PCBs in Caulk and PCB-Contaminated Soil and Building Materials](#) || [PDF version](#) (2 pp, 69K)
 - [Fact Sheet: Disposal Options for PCBs in Caulk and PCB-Contaminated Soil and Building Materials](#) || [PDF version](#) (4 pp, 32K)
- Any necessary and non-repetitive information in these fact sheets should be incorporated into the “Steps to Safe...” webpage.

9. The guidance on disposal in RCRA subtitle D landfills ([www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/caulk/guide/guide-sect4c.htm](#)) should emphasize that state agencies are the lead regulators on solid waste and often have additional requirements concerning the disposal of PCB containing wastes. As a result, the webpage should strongly urge the user to contact their state environmental agency regarding its requirements. Further, EPA should work with the state programs to ensure that links under the “Disposal Facilities” section (i.e., “To find a solid waste disposal facility that will accept PCB-containing caulk, contact your [state environmental agency](#)”) direct the user to the PCB-disposal expert or specific PCB information for each state agency, rather than to the general agency website.

The staff at the Maine Department of Environmental Protection took the lead on drafting an initial review of the webpage, and NEWMOA appreciates their initiative and effort. NEWMOA staff developed this letter based on Maine’s comments and facilitated the review process of the other New England states. NEWMOA is a nonprofit, nonpartisan interstate association that has a membership composed of the hazardous waste, solid waste, waste site cleanup, and pollution prevention program directors for the environmental agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. NEWMOA was established by the Governors of the New England states as an official regional organization to coordinate interstate hazardous and solid waste, pollution prevention, and waste site cleanup activities, and was formally recognized by the U.S. Environmental Protection Agency (EPA) in 1986.

Thank you for this opportunity to comment on the webpage. NEWMOA would be interested in organizing a follow-up conference call to discuss your responses and proposals for next steps. Please contact Jennifer Griffith at NEWMOA at jgriffith@newmoa.org or (617) 367-8558, ext 303 to discuss this letter and follow-up. We look forward to working with you on this important outreach effort.

Sincerely,

A handwritten signature in cursive script that reads "Terri Goldberg". The signature is written in black ink and is positioned below the word "Sincerely,".

Terri Goldberg

cc: Patrick Bowe, CT DEEP
David Wright, ME DEP
Jay Naparstek, Mass DEP
John Regan, NH DES
Leo Hellested, RI DEM
George Desch, VT DEC
Sarah Weinstein, Mass DEP
Jennifer Griffith, NEWMOA