

CONNECTICUT DEEP CAULK GUIDANCE

DISCLAIMER: THIS CHART IS NOT INTENDED TO REPLACE THE CT DEEP STATUTES OR THE PCB REGULATIONS UNDER 40 CFR PART 761.

	Caulk \geq 50 parts per million (ppm) PCBs (EPA)	Caulk < 50 ppm PCBs (CT DEEP) ⁽¹⁾
Renovation	Remove all caulk \geq 50 ppm	Remove caulk > 1 ppm – 49 ppm
Substrate	Test, and if > 1 ppm, clean up per 40 CFR § 761.61 and § 761.62 ⁽²⁾	Test, and if > 1 ppm, seal/encapsulate substrate as interim measure and obtain annual exemption per CGS 22a-466 or remove all substrate with > 1 ppm.
Non-renovation	Remove all caulk \geq 50 ppm and dispose in accordance with 40 CFR § 761.62	Encapsulate/seal any caulk > 1 ppm and < 50 ppm, have a plan to address at later date, and perform annual monitoring for effectiveness of encapsulant. DEEP recommends removal as soon as possible.
Substrate	Test, and if > 1 ppm, clean up per 40 CFR § 761.61 and § 761.62 ⁽²⁾	Test, and if > 1 ppm have plan to address at later date.

	Caulk \geq 50 parts per million (ppm) PCBs (EPA)	Caulk $<$ 50 ppm PCBs (CT DEEP) ⁽¹⁾
Full demolition	Remove caulk \geq 50 ppm and dispose in accordance with 40 CFR § 761.62	Remove caulk $<$ 50 ppm
Substrate	<p>If building substrate is $>$1 ppm, remove with caulk and dispose in accordance with 40 CFR § 761.62;</p> <ul style="list-style-type: none"> • a RCRA hazardous waste landfill • a TSCA-approved disposal facility • a solid waste landfill permitted under § 40 CFR Part 258 (RCRA title D) (for CT facilities, a special waste authorization may be required); • facilities permitted to manage non-hazardous waste subject to 40 CFR 257.5 -257.30 	<p>If substrate $>$ 1 ppm - 49 ppm, dispose at:</p> <ul style="list-style-type: none"> • A solid waste landfill permitted under RCRA title D (for CT facilities, a special waste authorization may be required); • Bulky waste landfill (for CT facilities, a special waste authorization may be required); • facilities permitted to manage non-hazardous waste subject to 40 CFR 257.5 -257.30 • a RCRA hazardous waste landfill

⁽¹⁾ **Caulk $<$ 50 ppm PCBs which meets the definition of an *Excluded PCB Product* at 40 CFR 761.3, is generally regulated by CT DEEP pursuant to CGS. Caulk that does not meet the criteria for an *Excluded PCB Product* may be regulated under 40 CFR Part 761 as a *PCB Remediation Waste* (EPA). An example of a *PCB Remediation Waste* would be replacement caulk that was installed in 1990 and was contaminated by contact with a PCB-contaminated substrate where the original caulk was \geq 50 ppm PCBs. Cleanup of *PCB Remediation Waste* would be regulated under 40 CFR § 761.61.**

⁽²⁾ Under the October 24, 2012 PCB Bulk Product Waste Reinterpretation, building substrates may be disposed of with attached caulk as a *PCB bulk product waste* in accordance with § 761.62. Building substrates remaining in place (after caulk/substrate removal) are classified as a *PCB remediation waste* and regulated for cleanup under § 761.61.