

Polychlorinated Biphenyls (PCBs) Requirements for Whole Building Deconstruction

Purpose of the Program: Polychlorinated biphenyls (PCBs) have been detected at elevated levels in certain sport fish in the San Francisco Bay. To make fish safer to eat and protect human health, PCB sources to the Bay need to be identified and controlled. Urban stormwater runoff is considered a significant pathway for PCBs to enter the Bay. The San Francisco Bay Regional Water Quality Control Board (Regional Water Board) has therefore required that Bay Area municipalities address potential sources to urban runoff, including sampling and proper disposal of certain building materials (e.g., caulks, sealants, insulation) that may contain PCBs. The Municipal Regional Permit (MRP), which is issued by the Regional Water Board, requires Bay Area local agencies to develop a program to prevent PCBs in building materials from entering storm drains during whole building deconstruction.

Effective date of Program: Requirements during whole building deconstruction to manage polychlorinated biphenyls (PCBs) containing materials and waste went into effect July 1st, 2019.

Affected Structures: The requirements apply to whole building deconstruction of, at a minimum, commercial, multi-family residential, public, institutional, and industrial structures constructed or remodeled between January 1, 1950, and December 31, 1980. Single-family and duplex residential, and wood frame structures are exempt.

Industry Stakeholders: The Program impacts a variety of industry stakeholders, including real estate developers, building owners and managers, facility managers, construction and demolition contractors, and environmental health and safety and remediation consultants.

Developers, Building Owners, and other Parties Involved in Building Deconstruction: It is advisable to assess for PCBs in building materials as early as possible (e.g., during cost-benefit analysis, Phase I/II Environmental Site Assessment, and/or CEQA). Unanticipated project costs and delays could potentially be avoided by early evaluation for PCBs (along with other pollutants such as asbestos and lead) in buildings that may be slated for deconstruction.

Required Submittals: During planning entitlement, applicants must complete the PCBs Deconstruction Program Planning Applicability Form. If the Project meets the Program Screening Criteria*, the applicant must submit the PCBs Applicant Package and the PCB sampling results with the building/deconstruction permit application.

*NOTE: Program requirements are considerable, and the required coordination with the Environmental Protection Agency and other agencies may take several months. It is recommended that projects conduct this step as early as possible prior to deconstruction (during the project planning process) to minimize delays.



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