

New Program to Manage PCBs during Building Demolition

Purpose of the Program: PCBs have been detected at elevated levels in certain sport fish in San Francisco Bay. To make the fish safer to eat and protect human health, PCBs 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 Regional Water Quality Control Board (RWQCB) has therefore required that Bay Area municipalities address potential sources to urban runoff, including certain building materials (e.g., caulks, sealants, insulation) that may contain PCBs. The Municipal Regional Permit (MRP), which is issued by the RWQCB, requires Bay Area local agencies to develop a program to keep PCBs from building materials out of storm drains during building demolition.



Affected Structures and Program Area: The requirements apply to whole building demolition of commercial, multi-family residential, public, institutional, and industrial structures constructed or remodeled between 1950 and 1980 in the MRP area: Counties of Alameda, Contra Costa, San Mateo, and Santa Clara and the Cities of Fairfield-Suisun and Vallejo. Single-family homes and wood-frame structures are exempt.

Regional Coordination: The Bay Area Stormwater Management Agencies Association (BASMAA) is assisting Bay Area local agencies to address these stormwater permit requirements and develop local programs to manage PCBs during building demolition. BASMAA has developed guidance and tools and conducted outreach and training, but each individual municipality will need to adopt and implement the new program. Individual municipalities should be contacted for more details and information on their programs.

Industry Stakeholders: The new program will impact 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. BASMAA has conducted a program of outreach to industry stakeholders, including emails and telephone calls, distribution of factsheets, an industry roundtable in August 2017, and general stakeholder meetings in December 2017 and May 2018. Industry representatives provided BASMAA with feedback on drafts of the tools and guidance via the roundtable and stakeholder meetings. The project Technical Advisory Group also included industry representatives and met periodically to review and provide feedback on selected BASMAA products as they were developed.

Note to Developers, Building Owners, and other Parties to Building Demolition: in light of this new program, it may be 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 demolition.

Effective date of new programs: Municipalities must adopt and implement the new program and whole building demolitions must comply with each municipal program by **July 1, 2019**. Individual municipalities should be contacted for more details and information on their programs.

For more information go to: basmaa.org/announcements

