EKI PCBs Series, Part 1

Polychlorinated biphenyls (PCBs) are man-made chemicals used in transformers, capacitors, caulking, paint, and other products prior to being banned in 1979 by the Toxic Substances Control Act (TSCA). PCBs fall under the umbrella of 'forever chemicals' which are persistent and do not readily break down once in the environment. PCBs are commonly an issue at legacy industrial sites slated for redevelopment and for stormwater/sediment matters.



Under TSCA, EPA has the primary authority to regulate PCBs, and while states may also have a regulatory program which is more stringent or broader in scope than the federal program, EPA has not delegated its PCB authority to states. Additionally, PCBs are not defined as hazardous wastes under RCRA. Federal, TSCA-based requirements for PCB testing, investigation, cleanup, and disposal can diverge widely from state requirements. PCB investigations, cleanups, and disposals can be difficult to navigate given this complex regulatory environment.

EKI has extensive and nationwide experience in coordinating federal and state requirements for self-implementing, performance-based, and risk-based cleanups under TSCA, including waste management aspects.

To learn more about PCBs and how EKI can be of assistance, reach out to:

West Coast - Deepa Gandhi, PE, Principal Engineer (dgandhi@ekiconsult.com)



Ms. Gandhi provides project and regulatory strategy, site investigation, and remediation, services to support redevelopment, brownfields, due diligence, property transaction, and industrial compliance projects. She specializes in management of multi-stakeholder sites, client portfolios, and evaluation of complex data sets for a wide variety of environmental media and chemicals (PCBs, chlorinated solvents, perchlorate, chromium, and petroleum hydrocarbons). Ms. Gandhi also provides litigation support, from testifying and consulting

expert services to technical expertise for business decision-making.

East Coast - David Melycher, LSP, LEP, Principal (dmelycher@ekiconsult.com)



Mr. Melycher assists municipal governments, regional utilities, national manufacturers, and regional commercial interests with large-scale environmental assessment and remediation projects. He provides technical and regulatory management of sites in state and federal programs including the federal RCRA Corrective Action Program, the Toxic Substance Control Act (TSCA) Program for PCBs, the Massachusetts Contingency Plan (MCP), the North Carolina Department of Environmental Quality (DEQ) Inactive Hazardous Sites Branch Program, and

the Connecticut Property Transfer Act and Voluntary Remediation Programs.

