



Manifest and Dispose of PCBs

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What are PCBs?

Polychlorinated biphenyls (PCBs) are not a single chemical, but a class of 209 synthetic chemicals, often used as insulators in electrical equipment, including transformers, capacitors and ballasts. PCBs also were used as plasticizers in caulking and thermal stabilizers in hydraulic and lubricating fluids.

Regulating PCBs

In Minnesota, PCBs are subject to

- Federal Toxic Substance Control Act (TSCA) Regulations administered by the U.S Environmental Protection Agency (EPA)
- Minnesota Hazardous Waste Rules administered by the Minnesota Pollution Control Agency (MPCA)

For more information on identification of PCBs and the terminology used in this and other PCBs fact sheets, see MPCA Hazardous Waste Factsheet #4.48a, Identifying, Using, and Managing PCBs, available on the MPCA's [hazardous waste publications](http://www.pca.state.mn.us/waste/pubs/business.html) Web page at www.pca.state.mn.us/waste/pubs/business.html.

When must one ship PCBs off site for disposal?

Within one year of the date removed from service*, you must ensure PCBs achieve final disposition – meaning they are actually incinerated, detoxified or otherwise managed. Include the time needed to transport and dispose of the equipment in this time limit. Therefore, one year, minus transport and disposal time is

the maximum time you can store an item. Since actual disposal of PCBs may take several months, be sure to budget enough time for transport, intermediate storage and final disposal of the waste.

**The date removed from service is the day the equipment was de-energized or disconnected from an electrical distribution system.*

PCB disposal

PCBs must be disposed of in a facility permitted by the EPA or an authorized state for hazardous waste or PCB treatment or disposal. Methods commonly used to treat PCBs include incineration, detoxification, and land disposal. Each method results in different waste products and liabilities for you, the original generator.

The MPCA recommends that you carefully research vendor services. Discuss options with your chosen vendor to determine the PCB treatment or disposal method most appropriate for your waste and desired future liability.

Transporting PCBs

Although Minnesota regulates PCBs as MN03-listed hazardous waste, you are not required to follow hazardous waste transport requirements provided PCBs are transported in accordance with the TSCA Regulations, discussed in this document.

If the PCBs meet any of the definitions of a Hazardous Material under the U.S. Department of Transportation's (DOT) [Hazardous Materials Regulations](http://www.dhs.gov/xlibrary/assets/hazardousmaterialsregulations.pdf) (HMR), ensure that PCB packaging and labeling also meets DOT requirements.

You do not need to use a hazardous waste transporter to convey PCBs. However, if the PCBs would be classified as a DOT hazardous material, you must ensure that the transporter meets all applicable DOT requirements under the HMR, including training, insurance, and placarding.

Vehicles loaded with one or more PCB transformers or 45 kilograms* of liquid containing PCBs must be marked with the PCB M_L mark. Transport vehicles must be marked on each side. For more information on PCB marking, see MPCA hazardous waste fact sheet #4.48b, *Marking and Labeling PCBs*, available on the MPCA's [hazardous waste publications](#) Web page.

**45 kilograms is approximately 8 gallons of high-density dielectric fluid or 12 gallons of mineral oil.*

Manifesting PCBs

General manifest requirements for PCBs

A Uniform Hazardous Waste Manifest must accompany all shipments from your site for disposal or storage for disposal of PCBs.

Note: This requirement also applies to shipments of equipment owned by one party that has contracted with an unrelated company to provide maintenance and disposal of its equipment. An example is a municipal utility that contracts with a regional cooperative for maintenance of the municipality's equipment. You may obtain manifests through most hazardous waste transporters or through printers authorized by the EPA.

Complete the hazardous waste manifest according to the directions printed on the manifest. TSCA Regulations allow generators that do not have a permanent PCB storage area to use the phrase "40 CFR PART 761" in place of their EPA Hazardous Waste Identification Number on the manifest. However, the MPCA discourages this practice, as it can make reconciling PCB records more difficult. For more information on permanent PCB storage areas, see MPCA hazardous waste fact sheet #4.48c, *Storing PCBs*, available on the MPCA's [hazardous waste publications](#) Web page.

Ensure that the actual location from which you are shipping PCBs, such as your temporary or permanent PCB storage area, is identified on the manifest. The location of your administrative offices, such as 'city hall' for municipal utilities, is not sufficient.

The designated facility indicated on the manifest may be:

- a permitted TSCA disposal facility

- a permitted hazardous waste disposal facility
- a commercial storer of PCB waste, such as when an electrical utility contracts with a larger utility to provide maintenance and disposal of its equipment

When shipping only PCBs, you need not send a copy of the hazardous waste manifest to the MPCA or Metropolitan County hazardous waste programs.

Specific manifest requirements for PCBs

For all shipments of PCBs, include the following information in addition to the standard information required by the printed manifest instructions. You need not, however, include the Minnesota-specific MN03 hazardous waste code for PCBs on the manifest.

For bulk loads of PCBs, such as oil in a tanker truck:

- the type of PCB waste
- the earliest date removed from service of the PCBs added to the bulk load
- the weight in kilograms of the PCB waste added to the bulk load

For PCB containers, such as oil in drums or over-packed electrical equipment:

- a unique identification number for each container
- the type of PCB waste in each container
- the earliest date removed from service of the PCBs in each container
- the weight in kilograms of the PCB waste in each container

For PCB articles, such as individual transformers:

- the serial number, or another unique identification number for each article if the serial number is not available
- the type of PCB article
- the date removed from service of each article
- the weight in kilograms of the PCB waste in each article, or the weight of each article if the specific weight of the PCB waste in the article is not known

Note: For PCBs, the date removed from service is the day the equipment in which the PCBs were contained was de-energized or disconnected from a distribution system. It is *not* the date you decided to dispose of the equipment or the date you shipped the PCBs or equipment off site. For more information on the date removed from service, see MPCA hazardous waste fact sheet #4.48c, *Storing PCBs*, available on the MPCA's [hazardous waste publications](#) Web page.

Note: Oil-filled equipment being disposed of, which has been verified through testing as only PCB-Contaminated or less and from which all fluid has been drained, may be managed equivalent to Non-PCB items. The MPCA considers such drained equipment to be non-hazardous. No manifest is required for transport of Non-PCB items. Manage the drained fluid as a regulated PCB-Contaminated waste.

Post-shipment requirements

Retain a copy of the manifest signed by your representative and the transporter until you receive the copy signed by the designated facility. Keep the facility-signed copy for at least three years. Generators subject to Annual Document Log requirements may be required to retain the copy longer. For more information on Annual Document Logs and PCB recordkeeping, see MPCA hazardous waste fact sheet #4.48e, Recordkeeping for PCBs, available on the MPCA's [hazardous waste publications](#) Web page.

If you do not receive a copy of the manifest signed by the designated facility within 35 days of the waste shipment, contact the transporter, the designated facility, and the MPCA for assistance locating the waste. If you still do not receive a copy of the manifest signed by the designated facility within 45 days of the waste shipment, submit an exception report to the EPA Regional Administrator. An exception report is simply a letter describing your efforts to obtain the signed copy.

You may receive a Certificate of Disposal from the designated facility or a subsequent facility documenting the disposal of your PCB waste. If you do, keep it with your manifest copies.

More information

The MPCA and EPA have staff available to answer your PCB management questions. For more information, contact MPCA or EPA Region 5 PCB staff.

Minnesota Pollution Control Agency

Toll free (all offices) 1-800-657-3864
St. Paul 651-296-6300
Web site..... www.pca.state.mn.us

U.S. Environmental Protection Agency, Region 5

Toll free (from Minnesota)..... 1-800-621-8431
Web site..... www.epa.gov/region5/

U.S. Environmental Protection Agency, Headquarters

TSCA Hotline 202-554-1404
Web site..... www.epa.gov

To access hazardous waste documents on the Minnesota Pollution Control Agency Web site, www.pca.state.mn.us,

1. Click on [Waste](#) on the menu bar.
2. On the pop-up submenu, click on [Publications](#).
3. On the Waste-related Publications page, click on [Hazardous Waste Publications](#).

PCB documents are located in the Specific Wastes section.
