



Storing PCBs

Contents

What are PCBs?	1
Regulating PCBs.....	1
When are PCBs stored?..	1
Hazardous waste storage	1
Storage for reuse	1
Storage for disposal	2
Temporary storage area..	2
Permanent storage area..	3
PCB bulk product waste storage area	3
Storing PCB wastes from others.....	3
More information	4

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 are PCBs 'stored'?

Any electrical equipment that is not energized and connected to the electrical distribution system is 'stored' and subject to TSCA storage requirements. (Materials documented as Non-PCB, and also oil-filled equipment tested as PCB-Contaminated which is drained of all fluid, are not subject to these requirements.)

Equipment removed from service must meet either:

- Storage for Disposal requirements or
- Storage for Reuse requirements

Neither the TSCA Regulations nor the Hazardous Waste Rules allow any interim unregulated status period.

Hazardous waste storage

Although Minnesota regulates PCBs as MN03-listed hazardous wastes, you are not required to follow hazardous waste storage requirements provided you store PCBs in compliance with TSCA Storage for Reuse or Storage for Disposal requirements.

Storage for reuse

You may store **working** equipment in good condition for future use, whether you know or assume it contains PCBs, if you meet these conditions:

- Store the equipment indefinitely in a compliant permanent PCB storage area (see page 3) and carry out documented inspections of the equipment every 30 days. Equipment may also be stored for reuse indefinitely at a permitted hazardous waste storage facility.

OR

- Store the equipment for less than five years from the date removed from service and maintain a storage-for-reuse record for the equipment.

Include in the record the date the equipment was removed from service and the intended use and location of use of the equipment.

If the equipment could be used at multiple locations, you may state in the record that it will be used at the 'next available' compatible location. You must then maintain service records to verify that 'next available' use.

Regardless of whether you store the equipment for reuse in a permanent PCB storage area or maintain a storage-for-reuse record, you must have a definite and specific plan to reuse the equipment; speculation on future use is not adequate.

Equipment stored for reuse that is not known to be in working order must be scheduled for repair at the time it is placed into storage for reuse and then repaired at the earliest reasonable time. Document the planned and actual date of repair.

Should you need to store a specific item of equipment for reuse (that you are not storing in a permanent PCB storage area) for longer than the five-year period, you may request an extension from the EPA Regional Administrator. Base your request on a specific need unique to your system and submit it at least six months before the expiration of your current five-year period.

Storage 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 the item. Since actual disposal of PCBs may take several months, be sure to budget enough time for transport, intermediate storage and final disposal.

You may store PCBs for disposal for up to 30 days from the date removed from service in a temporary PCB storage area. You must then either transport them off site for disposal or move them to a permanent PCB storage area. You may also store PCBs directly in a permanent PCB storage area.

**The date removed from service is the day the equipment was de-energized or disconnected from the electrical distribution system, whichever is first. If you have stored working equipment for reuse in compliance with all storage for reuse requirements and then only later decided to dispose of the equipment, in that case only, the date removed from service is the date of the decision to remove the equipment from storage for reuse.*

Temporary PCB storage area

You may store PCBs for disposal for up to 30 days from the date removed from service in a temporary PCB storage area. To do this you must:

- Mark the storage area with the M_L mark. For more information on TSCA marking, see MPCA Hazardous Waste fact sheet #4.48b, Marking and Labeling PCBs, available on the MPCA's [hazardous waste publications](#) Web page.
- Mark all PCB transformers, PCB voltage regulators and PCB large capacitors and all PCB containers with the M_L mark.
- Label all items in the storage area with the date removed from service. For containers holding wastes removed from service on multiple dates (such as sampling supplies), label the container with the generation date of the first waste placed into the container.
- Place all leaking items and uncontained waste (such as sampling supplies), into compatible closed containers marked with the M_L mark. Add sufficient absorbent materials to soak up the remaining volume of a leaking item.
- Prepare a Spill Prevention, Control, and Countermeasures (SPCC) plan for containers of liquid PCBs.
- Store liquid PCBs only in containers that comply with federal [Hazardous Materials Regulations](#) (HMR).

Temporary PCB storage areas need not be indoors or on an impermeable surface. If the temporary storage area is outdoors or on a permeable surface such as gravel, remember, you remain responsible to:

- Ensure no items or containers are leaking
- Immediately containerize any that might release PCBs

Alternative to the temporary PCB storage area

You may store non-leaking PCB large capacitors and equipment that you know or assume is PCB-contaminated on pallets immediately adjacent to a permanent PCB storage area provided:

- They are marked and labeled as described above
- The permanent PCB storage area has immediate space available for 10 percent or more of the volume of the items
- All items get weekly documented inspections

Permanent PCB Storage Area

You may store PCBs for *reuse* indefinitely in a permanent PCB storage area. You may store PCBs for *disposal* in a permanent PCB storage area for up to one year from the date removed from service, minus the time needed to transport and permanently dispose of them. To qualify as a permanent PCB storage area, you must meet these conditions:

- You notify the EPA you are operating a permanent PCB storage area by submitting [EPA Form 7710-53](#), Notification of PCB Activity. This form is available on the EPA's Web site at: www.epa.gov
- The storage area is not in a 100-year floodplain.
- The storage area is indoors.
- The storage area has continuous curbing at least six inches deep and attached to an impermeable floor, which together provide a containment volume of the greater of either
 - 200 percent or more of the largest item in the storage area or
 - 25 percent or more of the total of all items in the storage area.

You can meet this requirement either by curbing attached to the flooring, or by containment trays placed on top of a permeable surface.

- The storage area does not have any unsealed drains, joints, cracks or other openings.
- Mark the storage area with the M_L mark.
- Mark all known or assumed transformers, voltage regulators and large capacitors that you know or assume to contain PCBs, and containers of PCBs with the M_L mark.
- Label all items in the storage area with the date removed from service. For containers holding wastes generated on multiple dates (such as sampling supplies), label the container with the generation date of the first waste placed into the container.
- Place all leaking items and uncontained waste, such as sampling supplies, into compatible closed containers marked with the M_L mark.
- Perform and document inspections of all items in the storage area every 30 days.

PCB bulk product waste storage area

Examples of PCB bulk product wastes include PCB-containing fluorescent lamp ballasts, PCB-containing caulk and PCB-containing shredder residue.

Rather than using a temporary or permanent PCB storage area, you may store PCB bulk product wastes in a PCB bulk product waste storage area at the site of generation. Storage is limited to up to 180 days from the date the waste was generated. You must also meet these conditions:

- Store the waste on a liner designed, constructed, and installed to prevent migration of wastes into the environment. When choosing a liner, consider its strength, thickness, the foundation it will rest on and the area it must cover.
- Protect the waste with a cover designed, constructed, and installed to prevent migration of wastes into the environment and secured against normal seasonal weather conditions.
- Provide a precipitation-control system for the storage area sufficient for a 25-year storm.
- Maintain a log or other documentation establishing the earliest date of generation of PCB-containing waste stored in the PCB bulk product waste storage area

Storing PCB wastes from others

All of the storage conditions for PCBs discussed above apply to storing PCB waste from equipment you own.

If you accept waste PCBs from other parties to which your organization is not related, you are a 'commercial storer' of PCB waste. You are also a 'commercial storer' if you contract to perform maintenance on electrical equipment owned by another party to which your organization is not related and generate PCB waste because of it. A commercial storer has additional requirements dependent upon the amount accumulated.

Commercial storers accumulating 500 gallons or less of waste PCBs from others

If you are a commercial storer who never accumulates more than 500 gallons of other parties' waste PCBs on site, you must:

- Notify the EPA you are operating as a commercial storer of PCB waste by submitting EPA Form 7710-53, Notification of PCB Activity. This form is available on the EPA Web site.
- Only store others PCB waste in a permanent PCB storage area
- Manifest shipments of waste PCBs from the generation site to your permanent PCB storage area. For more information on manifests, see MPCA Hazardous Waste fact sheet 4.48d, Manifest and

Dispose of PCBs, available on the MPCA's [hazardous waste publications](#) Web page.

Note: Commercial storers of PCB Waste may be designated a 'Destination Facility' on a Uniform Hazardous Waste Manifest that is used only for shipment of waste PCBs. Commercial storers may sign such manifests without obtaining a Hazardous Waste Treatment, Storage, or Disposal Facility (TSDF) Permit.

- Prepare and maintain on site an Annual Document Log for each calendar year during which the facility operates as a commercial storer of PCB Waste. For more information on Annual Document Logs, see MPCA Hazardous Waste fact sheet 4.48e, Recordkeeping for PCBs, available on the MPCA's [hazardous waste publications](#) Web page.
- Submit annual reports to the EPA Regional Administrator documenting the number and mass of all types of waste PCBs received, stored and shipped, and the tracking numbers of all manifests signed or initiated, by the facility during the previous calendar year. Submit this report by July 15 for each year the facility operates as a commercial storer of PCB waste.
- Prepare a written closure plan for the commercial storer operation. Include post-closure sampling to ensure the facility is cleaned to at least PCB Spill Cleanup Policy standards before completing the closure process. For more information on PCB Spill Cleanup Policy standards, see MPCA Hazardous Waste fact sheet #4.48g, PCB Spill Cleanup Policy, available on the MPCA's [hazardous waste publications](#) Web page.
- Prepare a written closure cost estimate. Incorporate the cost of all elements of the closure plan. The preparer must certify the cost estimate using the certification defined in TSCA Regulations [40 CFR 761.3](#).
- Maintain financial assurance for closure in an amount at least equal to the closure cost estimate. Use one of the financial instruments allowed under TSCA Regulations [40 CFR 761.65\(g\)](#).

Commercial storers accumulating more than 500 gallons waste PCBs from others

Commercial storers who accumulate more than 500 gallons of PCB waste from others must meet all the requirements above.

In addition, you must obtain approval from the EPA Regional Administrator to operate as a commercial

storer of PCB waste. To get approval, submit an application to the EPA in which you:

- Describe how the facility will meet all of the requirements
- Detail the fitness of the facility and its employees to handle PCBs safely and in compliance with federal and state requirements

Note: Hazardous waste ten-day transfer facilities and permitted TSDFs need not seek approval as commercial storers.

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.
