Required Record Keeping
For PCB-Contaminated Equipment and Wastes

All information in this fact sheet is a summary of information found in 40 CFR (Code of Federal Regulations), Part 761.180. Please note that since federal rules are subject to change, these fact sheets are subject to change also.

Polychlorinated biphenyls (PCBs) are a class of 209 man-made chemicals with varying toxicity, often used as an insulator in electrical equipment. PCB products range in consistency from thin, light-colored oils to yellow, viscous resins.

The management of oil and equipment containing PCBs is both state and federally regulated, depending upon the concentration of PCBs present. The U.S. Environmental Protection Agency (EPA), under the Toxic Substances Control Act (TSCA), regulates the use, storage and disposal of PCBs with concentrations of 50 parts per million (ppm) or more. The Minnesota Pollution Control Agency (MPCA) regulates the storage and disposal of PCBs with concentrations of 50 ppm or more when they become wastes.

Federal rules require PCB users and waste generators to maintain records that document everything from equipment use and servicing to proper storage and disposal of PCBs. These records are required of all generators who manage PCB equipment in use and/or wastes that have a PCB concentration of more than 50 parts per million (ppm). This fact sheet outlines the requirements of PCB record keeping.

ANNUAL RECORDS--PCB WASTES

Generators who have wastes contaminated with more than 50 ppm PCBs are required to retain Annual Records for three consecutive calendar years after complete PCB disposal. Annual Records include the following:

1. Manifests. A manifest is a multi-page shipping document that must accompany all shipments of hazardous waste, to ensure that the waste has been handled and disposed of properly. Signed manifests must accompany each shipment of waste that contains more than 50 ppm PCBs, and manifest copies must be retained for three years after disposal of the waste. (For more information on shipping manifests, see fact sheet #4.48e, Manifest Requirements for Shipping PCB Wastes.)

2. Certificates of Disposal. These certificates document the ultimate
disposal of wastes generated at your facility during the calendar year, and must be kept for three years after disposal.

**ANNUAL DOCUMENT LOG--**
**PCB USE, STORAGE AND DISPOSAL**

An Annual Document Log inventories the use, storage and disposal of PCBs and PCB equipment with more than 50 ppm PCBs. Whether a generator must complete the log depends upon the amounts and/or types of PCB items used or generated in any given calendar year.

A generator must prepare an Annual Document Log if any of the following apply:

- the generator uses, stores or disposes of 45 kilograms (99.4 pounds) or more of PCBs equal to or greater than 50 ppm in containers, such as drums, tanks and tanker trucks;
- the generator uses, stores or disposes of one or more transformers that contain more than 500 ppm PCBs;
- the generator uses, stores or disposes of 50 or more large (more than three pounds) PCB capacitors.

**Annual Document Log--Required Contents**

The Annual Document Log must include the following information:

- name, address and EPA I.D. number of the facility;
- the calendar year covered by the Log;
- the manifest numbers of all manifests used to ship PCB wastes during the past calendar year; and
- an inventory of PCBs and PCB equipment in use, stored or disposed of properly.

The inventory of PCB wastes and/or equipment consists of six parts requiring similar types of information. **For all PCB and PCB equipment wastes listed below, the following basic information is needed:**

- the weight (in kilograms) of the PCB/PCB equipment wastes;
- the date the waste/item was removed from service for disposal;
- the date the waste/item was shipped off-site for disposal;
- the date the waste/item was properly disposed of, if known; and
- the totals of this information, including weight (in kilograms) of each item and the total number of items.

**Each different type of waste also has special requirements:**

1. For **bulk PCB wastes** with more than 50 ppm, such as tanker trucks, the above information is sufficient.

2. For **PCB articles** that contain PCBs above 50 ppm, such as transformers and capacitors, you also need to include the serial number or other I.D. number of each article.

3. For **PCB containers**, such as drums and tanker trucks, you should include a unique number that identifies each container, plus a description of the contents (such as liquids, debris or soil).

4. For **wastes in PCB article containers**, such as drums or capacitors, you should include a description of the contents (such as capacitors).

5. Generators must maintain a record of each telephone call made to a designated commercial store or disposal facility to confirm that the facility has received the PCB waste.

**The Annual Document Log also requires information for PCB equipment still in use.**
6. For PCB equipment that is remaining in service or stored for reuse at the end of the calendar year, the following information is needed:

- the total weight (in kilograms) of each PCB transformer;
- the total amount of PCB transformers and large capacitors; and
- the total weight (in kilograms) of PCBs and PCB items in PCB containers, including the identification of the contents.

**Annual Document Log--Additional Information**

The Annual Document Log for the previous calendar year must be prepared by July 1, and must be kept for at least three years after all PCBs have been removed from service at the facility and have been disposed of properly. If generators have received or shipped PCB waste from one of their own facilities to another, they must also include pertinent information in the disposal section of the Log.

**FOR MORE INFORMATION**

The MPCA has a series of fact sheets available on the use, maintenance and disposal of equipment using PCBs, based on state and federal guidelines.

*Use and Servicing of Equipment Containing PCBs* (#4.48a)

*Labeling and Marking Requirements for Equipment Containing PCBs* (#4.48b)

*Storage and Disposal of PCB-Contaminated Equipment and Wastes* (#4.48c)

*Required Record Keeping for PCB-Contaminated Equipment and Wastes* (#4.48d)

*Manifest Requirements for Shipping PCB Wastes* (#4.48e)

*Managing PCBs in Fluorescent Light Ballasts* (#4.48f)

*PCB Spill Cleanup Policy* (#4.48g)

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If you need further information, contact the MPCA at:

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TSCA Hotline: (202) 554-1404