



# Marking and Labeling PCBs

## 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](http://www.pca.state.mn.us/waste/pubs/business.html).

## Hazardous waste labeling

Although Minnesota regulates PCBs as MN03-listed hazardous wastes, you are not required to follow hazardous waste labeling requirements if you label wastes in accordance with TSCA Regulations.

## TSCA marking

TSCA Regulations require certain items to carry a specified standard mark, the Large PCB Mark (M<sub>L</sub>) shown smaller than actual

size in Figure 1 and actual size in Figure 3. The standard required size of the M<sub>L</sub> mark is six inches square; however, for use on specific items too small for the full-sized marking, it may be reduced to a minimum size of two inches square. The mark must be black lettering on a yellow or white background. Yellow is more common.

For specific equipment too small for the minimum size of the M<sub>L</sub> mark, the TSCA Regulations allow use of an alternate mark: the Small PCB Mark (M<sub>S</sub>). This mark is shown smaller than actual size in Figure 2 and actual size in Figure 4. The standard required size of the M<sub>S</sub> mark is one inch high by two inches wide; however, for use on items too small even for the full size of this mark, it may be reduced to a minimum of one centimeter (cm) by two cm (approximately 3/8 inch by 3/4 inch). The mark must be black lettering on a yellow or white background. Yellow is more common.

## What must be marked?

Apply the appropriate TSCA mark to:

### At all times

- PCB transformers
- Access ways to PCB transformers
- PCB voltage regulators containing 3 pounds or more of fluid (about 1 quart)
- Access ways to marked PCB voltage regulators
- PCB capacitors containing 3 pounds or more of fluid (known as PCB Large Capacitors)
- Containers of PCB and PCB-Contaminated materials (such as oil, used sampling supplies), PCB ballasts or small capacitors, and leaking electrical equipment



Figure 1: Large PCB Mark (M<sub>L</sub>) shown smaller than actual size.



Figure 2: Small PCB Mark (M<sub>S</sub>) shown smaller than actual size

## At certain times

- PCB permanent storage areas, when they contain PCBs
- PCB temporary storage areas, when they contain PCBs
- Transport vehicles, when loaded with one or more PCB Transformers or 45 kilograms of liquid containing PCBs (about eight gallons of high density dielectric fluid or 12 gallons of mineral oil)  
Transport vehicles must be marked on each side.

You need not mark electrical equipment that is in service, whether it is known or assumed to be PCB-Contaminated. ('In service' means connected to an electrical distribution system and energized.)

## 'Date removed from service' labeling

In addition to any required TSCA marking, you must put the date removed from service on equipment and wastes stored for disposal that you know or assume contains PCBs. The 'date removed from service' is the day the equipment was de-energized or disconnected from an electrical distribution system, whichever is first. It is *not* the date you received test results for the equipment.

It is also *not* the date you decided to dispose of the equipment – unless you previously stored the equipment for reuse, complied with all Storage for Reuse requirements and then only later decided to dispose of it. In this case only, the date removed from service would be the same as the date you decided to remove the equipment from Storage for Reuse.

While not required, the MPCA strongly recommends also putting the date removed from service on equipment you know or assume contains PCBs that is being stored for reuse. Doing this will help ensure that you do not store equipment for longer than the allowed Storage for Reuse time limit.

When you remove equipment from service for testing to determine how to dispose of it, it must meet either:

- Storage for Disposal requirements and be labeled with the date removed from service or
- Full Storage for Reuse requirements

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

For more information about PCB storage requirements, see MPCA Hazardous Waste fact sheet #4.48c, Storing 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](http://www.pca.state.mn.us/waste/pubs/business.html).

## Non-regulatory marks

Except for permanent markings such as nameplates applied by the manufacturer or remanufacturer of equipment stating the content of PCBs of the equipment, only the PCB marks  $M_L$  and  $M_S$  are recognized marks for PCBs in Minnesota. You cannot rely on any other marks, including the blue-with-white-lettering "Certified" label, unless you have analytical test results or other documentation showing the basis for those markings.

You may choose to apply other markings common in your industry, however these are not required.

## More information

The MPCA and EPA have staff available to answer your PCB management questions. For more information, contact the 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](http://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/](http://www.epa.gov/region5/)

### U.S. Environmental Protection Agency, Headquarters

TSCA Hotline ..... 202-554-1404  
Web site ..... [www.epa.gov](http://www.epa.gov)

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To access hazardous waste documents on the Minnesota Pollution Control Agency Web site, [www.pca.state.mn.us](http://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.

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Figure 3: Large PCB Mark (M<sub>L</sub>) shown actual size.



Figure 4: Small PCB Marks (M<sub>S</sub>), shown actual size

