

Marking PCBs

What are PCBs?

Polychlorinated biphenyls (PCBs) are a class of 209 toxic man-made chemicals that persist in the environment and bioaccumulate in animals and humans. PCBs were used extensively in many industrial products from the 1950's through 1978, including electrical equipment, hydraulic fluids, paints, and caulking. Exposure to PCBs can cause a range of human health effects and environmental impacts.

In Minnesota, PCBs are regulated by two separate but overlapping sets of requirements:

- Federal Toxic Substances Control Act (TSCA) Regulations
- Minnesota State Hazardous Waste Rules and Statutes

This fact sheet will provide guidance for Minnesota PCBs users to meet both sets of requirements. For more information on identifying PCBs and the PCBs-related terminology used in this fact sheet, see Minnesota Pollution Control Agency (MPCA) fact sheet #w-hw4-48a, Identifying and using PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48a.pdf>

How must PCBs and equipment containing PCBs be marked?

Certain PCBs-related items listed below must be marked with the [Large PCB Mark](#) (M_L), shown on page 3. The standard size for the M_L mark is six inches square; however, when necessary, the M_L mark may be reduced as needed to a minimum size of two inches square. Equipment still too small for the reduced M_L mark may instead be marked with the [Small PCB Mark](#) (M_S), also shown on page 3. Both the M_L and M_S marks must be black lettering and border on a yellow or white background. You are not required to add your business name and telephone number to the M_L mark on the provided lines, but adding this information can speed your notification in case of a spill or other incident, speeding your response and reducing your risk and costs.

Though waste PCBs are also regulated in Minnesota as MN03 listed hazardous wastes, you must follow the PCB marking requirements in this fact sheet instead of the normal hazardous waste labeling requirements.

Labels other than the M_L may be added to equipment containing PCBs, but are not required and do not meet any regulatory requirements. Common examples include black-on-yellow labels that appear similar to the M_L , but instead state “*PCB-Contaminated Electrical Equipment: The dielectric fluid in this unit has been tested...*” or “*PCB Contaminated: A fluid sample taken from this unit was analyzed...*” or similar language. Such labels are intended solely for internal utility or other business convenience.

What must be marked with the M_L ?

At all times:

- PCB Transformers, Large Capacitors, and Voltage Regulators
- Access ways to PCB Transformers, Large Capacitors, and Voltage Regulators in use or storage for reuse
- PCB Containers and Article Containers

Only when PCBs are present:

- PCB Permanent Storage Areas and Temporary Storage Areas
- Each side of vehicles transporting PCB Transformers or transporting PCB Containers ≥ 45 kilograms liquid

PCB-Contaminated transformers and equipment documented as Non-PCB do not need to be marked.

What other marking related to PCBs is required?

PCB Articles, such as PCB-Contaminated Transformers or PCB Large Capacitors, as well as PCB Article Containers, must also be physically marked with the **date removed from service**. PCB Containers must be physically marked with the earliest date removed from service of the waste PCBs in the container. For electrical equipment, the date removed from service is the day the equipment was disconnected from the electrical distribution system, not the day you may have received test results of the equipment's PCBs content. For other wastes such as hydraulic or thermal equipment, the date removed from service is the date the regulated components were physically removed from a system. The date removed from service must either be marked directly on the item, such as with a permanent marker, paint, or label, or be printed on a tag physically attached to the item.

May I rely on labeling to show wastes are Non-PCB?

You may document that equipment is Non-PCB through only three methods:

- 1) Nameplate, or other equivalent permanent marking from the manufacturer or remanufacturer, that states that the equipment was Non-PCB at the time of manufacturer or remanufacture.**
User-applied labels are not considered nameplates and may not be relied on as documentation that equipment is Non-PCB. Common examples include white-on-blue labels that state "*Certified: The dielectric fluid in this unit has been tested...*" or blue-on-white labels that state "*No PCBs (Less than 1 PPM) This unit has been classified by:...*" or similar language. Such labels are intended solely for your business convenience.
- 2) Established date of manufacture or remanufacture after July 2, 1979.**
- 3) Analytical testing using gas chromatography or alternate method approved by the U.S. Environmental Protection Agency (EPA).**

For more information on classifying equipment and wastes that potentially contain PCBs, see MPCA fact sheet #w-hw4-48a, Identifying and using PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48a.pdf>

More information

Guidance and requirements in this fact sheet were compiled from the Code of Federal Regulations (CFR), Title 40, Chapter 761; Minnesota Rules, Chapter 7045; and Minnesota Statutes, Chapter 116. To review the CFR, visit the U.S. Government Information website at: <https://www.govinfo.gov/>. To review Minnesota Rules and Statutes, visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/>.

Immediately report all PCB spills that reach the environment to the Minnesota Duty Officer. Federal environmental oversight in Minnesota is implemented by the EPA's Region 5 office.

Minnesota Pollution Control Agency

Toll free (all offices) 800-657-3864
All offices 651-296-6300

<https://www.pca.state.mn.us/>

Minnesota Duty Officer

Toll free 800-422-0798
Metro 651-649-5451

U.S. Environmental Protection Agency

Toll free (Region 5) 800-621-8431
TSCA Hotline 1-800-471-7127

tsc hotline@epa.gov

<https://www.epa.gov/>

M_L



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