

Storing 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>

When do PCBs storage requirements apply?

PCBs, and any equipment that contains PCBs, must always meet the requirements for [storage for reuse](#) or for [storage for disposal](#) any time the equipment is not physically connected to the system it is used in; there is no other option for interim or unregulated storage, such as awaiting sampling or test results.

However, waste PCBs are not subject to the hazardous waste accumulation requirements that apply to most other hazardous wastes in Minnesota. For information on accumulation requirements applicable to hazardous wastes that are not PCBs, see MPCA fact sheet #w-hw1-05, Accumulate hazardous waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-05.pdf>

Storage for reuse

Unless you have documented that equipment you wish to store for reuse is Non-PCB, you must apply the PCBs classifications assumptions for use in MPCA fact sheet #w-hw4-48a, Identifying and using PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48a.pdf>

Equipment stored for reuse must be in working condition ready to use, or must be scheduled for repair, and you must affirmatively intend to use the equipment. The equipment may be stored for reuse:

- Indefinitely in a [Permanent PCBs Storage Area](#) described on page 2; or
- <5 years anywhere, if you maintain a record, sometimes called a *Storage for Reuse Plan*, that includes the **date removed from service** and the projected location and future use of the equipment.

If the equipment could be used at multiple locations, you may state in the record that it will be used in the next available compatible location. You then may use service records to demonstrate that you complied with that plan.

For more information on the date removed from service, see MPCA fact sheet #w-hw4-48b, Marking PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48b.pdf>

Storage for disposal

While the PCBs classifications assumptions for use do apply to equipment being stored for reuse, they do not apply to equipment being stored for disposal. However, the PCBs storage for disposal requirements apply to any equipment or other wastes that are actually PCB or PCB-Contaminated, beginning on the date removed from service, **regardless of whether you know the equipment's PCBs classification or not**. Waiting for sampling or PCBs test results does not exempt waste PCBs from compliance with the storage for disposal requirements. Therefore, the MPCA recommends you store any waste that might contain PCBs in compliance with the storage for disposal requirements until you document it is Non-PCB.

Storage for disposal of your own waste PCBs is divided into two levels of areas for all equipment and wastes, and a limited alternative level for some limited wastes. Though neither the Federal TSCA Regulations nor the Minnesota Hazardous Waste Rules assign specific names to these levels, they are commonly known as:

- **Temporary PCBs Storage Area**, also sometimes called *short-term storage*
≤30 days from the date removed from service per PCB Article (piece of equipment). This period does not reset if equipment is moved to another site you operate; after 30 days the equipment must meet the **Permanent PCB Storage Area requirements** regardless of location.
- **Permanent PCBs Storage Area**, also sometimes called long-term storage or one-year storage
≤365 days from the date removed from service per PCB Article. Both of the alternate names are misleading and discouraged. The name long-term storage is generally used by the U.S. Environmental Protection Agency (EPA) in relation to landfills. The name one-year storage is often misunderstood to mean that equipment can remain in storage for a year, then be shipped off-site for disposal afterwards, while in fact **final disposal of waste PCBs must all be completed within one year of the date removed from service**, meaning incineration, detoxification, or landfilling, not just shipping off-site.
- **PCB Bulk Product Waste Storage Area**
≤180 days from the earliest date removed from service of the PCB Bulk Product Waste. This period also does not reset if the waste is moved to another site you operate; after 180 days the waste must meet the **Permanent PCB Storage Area requirements** regardless of location. For more information about what PCB Bulk Product Wastes are, 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>

Temporary PCBs Storage Area requirements

Temporary PCBs Storage Areas may be indoors or outdoors and on any surface.

- Mark the storage area with the Large PCB Mark (M_L), such as on a wall adjacent to the storage area if indoors, or on a fence or post adjacent to the storage area if outdoors. For more information on the M_L, see MPCA fact sheet #w-hw4-48b, Marking PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48b.pdf>
- Mark all PCB Transformers, PCB Large Capacitors, PCB Voltage Regulators, and containers with the M_L.
- Physically mark all equipment with the date removed from service. The date removed from service must be marked directly on the equipment, such as with permanent marker or label, or be on an attached tag.
- Physically mark all containers with the earliest date removed from service of the container contents.
- Overpack all leaking equipment and uncontained items, such as sampling waste, into a closed container.
- Store liquid PCBs, such as oil, only in packaging authorized under the U.S. Department of Transportation's (DOT) Hazardous Materials Regulations (HMR), such as steel drums. For questions about the HMR, contact the DOT or Minnesota Department of Transportation (MnDOT). See **More information** on page 4.
- Prepare a Spill Prevention, Control, and Countermeasures Plan (SPCC) for any containers of liquid PCBs. For more information about SPCCs, see the MPCA's Spill preparedness webpage at: <https://www.pca.state.mn.us/about-mpca/spill-preparedness-oil-and-hazardous-substances>

Permanent PCBs Storage Area requirements

Permanent PCBs Storage Areas must be indoors in a building not in a 100-year floodplain.

- Meet all the [Temporary PCBs Storage Area requirements](#) on page 2.
- Provide continuous curbing ≥ 6 inches deep, such as with poured concrete walls, livestock tanks, or spill pallets. If using spill pallets, the stored PCBs must not align with or overhang the pallet sides.
- Ensure a secondary containment capacity of either $\geq 200\%$ of the largest item in the storage area, or $\geq 25\%$ of the total stored volume, whichever is greater.
- Ensure the secondary containment is not compromised, such as by unsealed cracks or expansion joints.
- Perform and document inspections of the storage area at least every 30 days.
- Verify that actual site of the Permanent PCB Storage Area has been issued a Hazardous Waste Identification Number (HWID, also known as an EPA ID#) by the MPCA, and that the HWID is not assigned to any other physical site, such as the “city hall” of a municipal electrical utility.
- Notify the EPA by submitting EPA Form 7710-53, Notification of PCB Activity, and marking Box A “Generator w/on-site storage facility” in Item 6. Do not mark Box B unless your site is also separately a commercial storage facility discussed below. Enter the site’s verified HWID. To obtain this form, visit the EPA’s website at <https://www.epa.gov> and search for “7710-53”.

Confirmed PCB-Contaminated equipment and PCB Large Capacitors may alternatively be stored without curbing on pallets outdoors or indoors if stored next to a Permanent PCB Storage Area that has space immediately available for $\geq 10\%$ of the equipment and capacitors, and if weekly documented inspections are performed.

PCB Bulk Product Waste Storage Area requirements

PCB Bulk Product Waste Storage Areas may be indoors or outdoors but are only for PCB Bulk Product Waste.

- Mark the storage area and all containers with the M_L.
- Physically mark all containers with the earliest date removed from service of the container contents.
- If containers are not used, provide a liner and cover sufficient to prevent any exposure to precipitation from a 25-year storm and to prevent any release of PCBs to the environment.

Can I accept waste PCBs from others or work on their equipment?

You may accept waste PCBs from others or generate waste PCBs from working on their equipment. If you accept possession of the waste, you will become a **commercial storer of PCB waste**, and any site where you store such waste will be a **commercial storage facility**. An exception to this result is if you accept waste PCBs from a **related company**, such as a subsidiary, parent, sibling, or joint ownership; or if you are a regional electric cooperative accepting waste PCBs from or performing work for one of the cooperative members; you may treat waste PCBs from related companies as if it were your own, however you also then are jointly responsible for it.

- Store all waste PCBs from others in a [Permanent PCB Storage Area](#) and meet all its requirements.
- Prepare a PCB Annual Document Log every calendar year for the commercial storage facility. For information on PCB Annual Document Logs, see MPCA fact sheet #w-hw4-48e, Recordkeeping for PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48e.pdf>
- Submit an annual report to the EPA using EPA Form 6200-025, PCB Annual Report Form. To obtain this form, visit the EPA’s website at <https://www.epa.gov> and search for “6200-025”.
- Prepare a written estimate of the cost for an independent contractor to close the commercial storage facility, based on the maximum volume of waste PCBs that will be accepted at the facility.
- Maintain financial assurance for closure in a trust fund, bond, letter of credit, or insurance sufficient to cover the written closure cost estimate.
- If you store more than 500 gallons of waste PCBs from others at any time, you must also obtain approval from EPA Region 5 for the commercial storage facility. See [More information](#) on page 4.

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/>

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/>

Minnesota Duty Officer

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

Minnesota Department of Transportation

Hazardous Materials..... 651-215-6330

<http://www.dot.state.mn.us/>

U.S. Department of Transportation

Hazardous Materials..... 800-467-4922

<http://www.phmsa.dot.gov/>