

Manifesting and disposing of 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 Statutes and Rules

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 (MPCA) fact sheet #w-hw4-48a, Identifying and using PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48a.pdf>

Which waste PCBs are subject to specific disposal requirements?

In Minnesota, all wastes that contain PCBs ≥ 50 parts per million (ppm) must be disposed as regulated hazardous wastes, even if the wastes would be eligible for reduced disposal requirements under just the Federal TSCA Regulations, such as fluorescent lighting ballasts, small capacitors, sealants, and coatings.

For more information, see MPCA fact sheet #w-hw4-48f, PCBs in ballasts and small capacitors, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48f.pdf>

and MPCA fact sheet #w-hw4-48k, PCBs in sealants and coatings, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48k.pdf>

Used oil that contains PCBs at 2-49 ppm must be managed as an off-specification used oil. Used oil must be tested for PCBs content from each source; you may not mix used oil from multiple sources and then test just the final mixture. For more information, see MPCA fact sheet #w-hw4-30, Used oil and related wastes, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-30.pdf>

PCB-Contaminated equipment that has been fully drained for disposal may be managed as Non-PCB waste.

PCB and PCB-Contaminated equipment that you have decided to reuse and that is maintained in usable condition is not considered a waste; however, you must meet all the PCB storage for reuse requirements in MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>

When must I ship waste PCBs from my site for disposal?

Generators of waste PCBs must ensure that their waste is actually finally disposed, meaning incinerated, detoxified, or landfilled, not just shipped from their site or stored by another party, within one year of the date removed from service.

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.

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

Instead, you must ensure waste PCBs are stored in compliance with the requirements discussed in MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>

When is a manifest required to transport PCB wastes?

Prepare a Uniform Hazardous Waste Manifest (U.S. Environmental Protection Agency (EPA) Form 8700-22) for all shipments of PCB wastes from your site to any other entity except a related company. Unlike most other hazardous wastes, you or your contractor may transport your waste PCBs without a manifest to other sites you own or operate, or to a site operated by a related company. For more information on related companies, see MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>

General manifest requirements for PCB wastes

Complete the manifest according to the instructions printed on it and the specific information discussed below in this fact sheet. For more guidance regarding manifest instructions, see MPCA fact sheet #w-hw1-07, Manifest shipments of hazardous waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf>

If you have operated a Permanent PCB Storage Area at the physical site from which you are manifesting waste PCBs, ensure that that site has been issued a Hazardous Waste Identification Number (HWID, also known as an EPA ID#), and you must use that HWID in Item 1 of the manifest. Do not use an HWID assigned to any other physical site, such as the “city hall” of a municipal electrical utility. For more information on when operation of a Permanent PCB Storage Area is triggered, see MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>

To check to what physical site an HWID is assigned to, use the MPCA’s What’s in my neighborhood tool at: <https://www.pca.state.mn.us/about-mpca/whats-in-my-neighborhood>

To request an HWID for your site, see MPCA fact sheet #w-hw5-12, Notification of Regulated Waste Activity, at: <https://www.pca.state.mn.us/sites/default/files/w-hw5-12.pdf>

If you have never operated a Permanent PCB Storage Area at the site from which you are manifesting waste PCBs, you may instead enter “40 CFR PART 761” in Item 1 of the manifest. However, the MPCA discourages this practice, as it can complicate finding your manifests in the EPA’s eManifest system. All sites from which waste PCBs are manifested must obtain an HWID for annual reporting purposes, even if not required for the manifest.

The Minnesota-specific “MN03” hazardous waste code is not required to be entered into Item 13, however, the MPCA encourages its voluntary use, as it can make reconciling your annual reports with manifest records easier.

Specific manifest requirements for PCB wastes

In Item 14 of the manifest or on another physical attachment to the manifest, enter for **each**:

- **Bulk load**, such as oil in a tanker truck: the identity of the waste, the earliest [date removed from service](#) of the waste in the bulk load; and the mass in kilograms of the waste you added to the load.
- **PCB Container or PCB Article Container**, such as oil in a drum or overpacked leaking equipment: a unique identifying number for the container; the identity of the waste in the container; the earliest [date removed from service](#) of the waste in the container; and the mass in kilograms.
- **PCB Transformer or PCB Large Capacitor**: the transformer or capacitor serial number; the [date removed from service](#); and the mass in kilograms.
- Other line item of PCB Articles, including **PCB-Contaminated Transformers**, non-containerized small capacitors, oil-filled bushings, circuit breakers or reclosers, and other equipment: the type of the waste; the earliest [date removed from service](#) of the waste in the line item, and the mass in kilograms.

Post-shipment requirements for PCB wastes

Retain a copy of the manifest signed by your site representative and the transporter until you verify that the manifest is available in the EPA’s eManifest system. To access the eManifest system, visit the EPA at: <https://www.epa.gov/> and search for “eManifest”. If you cannot verify that the manifest is available in the eManifest system, follow the Exception Report requirements discussed in MPCA fact sheet #w-hw1-07, Manifest shipments of hazardous waste, at: <https://www.pca.state.mn.us/sites/default/files/w-hw1-07.pdf>

Retain copies of all manifest attachments not available in the eManifest system for:

- If you have never operated a Permanent PCB Storage Area at the site from which the manifested waste was shipped, three years from the shipment date.
- If you have operated a Permanent PCB Storage Area at the site from which the manifested waste was shipped, three years from the shipment date, or three years after the last date you operated a Permanent PCB Storage Area at the site, whichever is longer.

For any calendar year you manifested collectively 45 kilograms or more of PCB wastes in a bulk load or in PCB Containers, or manifested one or more PCB Transformers, you must prepare a PCB Annual Document Log for that calendar year by July 1st of the following year. For more information on PCBs manifest records and 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>

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. For questions about transportation of PCBs as hazardous materials under the U.S. Department of Transportation’s (DOT) Hazardous Materials Regulations (HMR), contact the DOT or the Minnesota Department of Transportation. 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..... 1-800-467-4922
<http://www.phmsa.dot.gov/>