



Manifest and Dispose 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. For more information on other potentially PCB-containing materials, PCB terminology, and how to test for PCBs, visit the Minnesota Pollution Control Agency (MPCA) at <http://www.pca.state.mn.us/publications/w-hw4-48a.pdf> to view hazardous waste fact sheet #w-hw4-48a, [Identifying, Using, and Managing PCBs](#).

How are PCBs regulated?

In Minnesota, PCBs are subject to two sets of regulations:

1. Federal Toxic Substances Control Act (TSCA) Regulations administered by the U.S. Environmental Protection Agency (EPA)
2. Minnesota Hazardous Waste Rules administered by the MPCA

This fact sheet will provide guidance regarding transport for disposal of PCBs under these requirements.

When must PCBs be shipped off site for disposal?

Within one year of the date removed from service*, you must ensure your PCBs achieve final disposition – meaning they are actually incinerated, detoxified or otherwise disposed. Include the time needed for your PCB wastes to be transported to and held at the treatment or disposal facility in this time limit. Remember that transport and holding of your PCB wastes may take several months.

*The *date removed from service* is the day electrical equipment was de-energized or disconnected from the electrical distribution system, or the day other PCB wastes were removed from actual use, such as when hydraulic pistons are replaced. The *date removed from service* is *not* the day you received test results, unless you had already met the *PCB storage for reuse* requirements. For more information regarding storing PCBs for reuse or disposal, see MPCA hazardous waste fact sheet #w-hw4-48, [Storing PCBs](#), at <http://www.pca.state.mn.us/publications/w-hw4-48c.pdf>.

Where may PCBs be shipped for disposal?

PCBs must be disposed of in a facility permitted by the EPA or an authorized state for hazardous waste or PCB treatment or disposal. Methods commonly used to treat PCBs include incineration, land disposal and detoxification. Each method results in different waste products and liabilities for you, the generator.

Who may transport PCBs?

You may consolidate PCBs using your own vehicle to transport them between sites you own. In this case you do not need a hazardous waste manifest. If the volume of PCBs or the type of material contaminated with PCBs would meet the definition of a *hazardous material* under the Federal Hazardous Materials Regulations (HMR) administered by the U.S. Department of Transportation (DOT),

ensure that the packaging and labeling of the PCBs, and the training, insurance, and placarding of the transporter all comply with the HMR.

Mark vehicles with the PCB M_L mark on each side of the vehicle when they are loaded with one or more PCB transformers or 45 kilograms* or more of liquid containing PCBs. For more information on PCB marking, see MPCA hazardous waste fact sheet #w-hw4-48b, [Marking and Labeling PCBs](http://www.pca.state.mn.us/publications/w-hw4-48b.pdf), at <http://www.pca.state.mn.us/publications/w-hw4-48b.pdf>.

*45 kilograms is approximately 8 gallons of high-density dielectric fluid or 12 gallons of mineral oil.

Ensure that any transporter you use has obtained a Hazardous Waste Identification Number (HWID).

General manifest requirements for PCBs

Prepare a Uniform Hazardous Waste Manifest (EPA Form 8700-22) for all shipments of PCBs from your site or your system, except for shipments between your own sites, or shipments in which the PCBs are being transported for reuse. Obtain manifests through most hazardous waste transporters or from printers authorized by the EPA. Complete the manifest according to the directions printed on it and the specific information below in this fact sheet. For more guidance regarding manifests, see MPCA hazardous waste fact sheet #w-hw1-07, [Manifest Shipments of Hazardous Waste](http://www.pca.state.mn.us/publications/w-hw1-07.pdf), at <http://www.pca.state.mn.us/publications/w-hw1-07.pdf>.

Note: You are still responsible for preparing a manifest, even if you contract with an unrelated business to manage and maintain your equipment. For example, if you are a municipal electrical utility that has contracted with a regional electrical cooperative to maintain your distribution system, you are responsible for preparing the manifest.

If your site does not have a Permanent PCB Storage Area, you may use the phrase “40 CFR PART 761” in place of your HWID in Item 1 on the manifest. However, the MPCA discourages this practice since it can make reconciling your PCB records more difficult.

Ensure that the actual location from which you are shipping your PCBs, such as the site of your Temporary or Permanent PCB Storage Area, is identified on the manifest in Item 5 as the Generator’s Site Address. Do not use the location of your administrative offices, such as ‘city hall’ for municipal electrical utilities.

The designated facility you are required to enter onto the manifest may be one of the following:

- permitted TSCA disposal facility
- permitted hazardous waste disposal facility
- commercial storer of PCB waste

If you are only disposing of fully-drained electrical equipment that contained PCB-contaminated oil (50-499 parts per million PCBs verified by testing), you may manage the drained equipment equivalent to Non-PCB items. No manifest is required for transport and the drained equipment is considered non-hazardous. Manage the drained oil as a PCB waste.

Specific manifest information for PCB wastes

For all PCB wastes, in Item 13, enter the Minnesota-specific “MN03” hazardous waste code for each line item on the manifest.

For bulk loads of PCB waste, such as oil in a tanker truck, in Item 14 or on an attachment enter:

- the type of PCB waste, such as oil, contaminated soil, or paper
- the earliest date removed from service of any PCBs added to the bulk load
- the weight in kilograms of any PCB waste added to the bulk load

For PCB containers, such as oil in drums or over-packed articles, in Item 14 or on an attachment enter:

- a unique identification number for each container;
- the type of PCB waste in each container, such as oil or leaking equipment;
- the earliest date removed from service of the PCBs in each container; and
- the weight in kilograms of the PCB waste in the container.

For PCB articles, such as individual transformers, in Item 14 or on an attachment enter all of the following:

- the serial number or another unique identification number for each article
- the date removed from service of the article
- the weight in kilograms of the PCB waste in the article, or the total weight of the article if the specific weight of the PCB waste is not known

Remember, the date removed from service is the day electrical equipment was de-energized or disconnected from the electrical distribution system, and other equipment was removed from actual use, not the day you received test results or shipped the equipment off-site, unless you had already met the PCB storage for reuse requirements.

Post-shipment requirements for PCBs

Retain a copy of the manifest signed by your representative and the transporter until you receive the copy signed by the designated facility. Keep the facility-signed copy for at least three years. Generators subject to Annual Document Log requirements may be required to retain the copy longer. For more information on Annual Document Logs and PCB recordkeeping, see MPCA hazardous waste fact sheet #w-hw4-48e, [Recordkeeping for PCBs](#), at <http://www.pca.state.mn.us/publications/w-hw4-48e.pdf>.

If you do not receive a copy of the manifest signed by the designated facility within 35 days of the waste shipment, contact the transporter, the designated facility, and the MPCA or EPA for assistance locating the waste. If you do not receive the facility-signed copy within 10 more days, submit an exception report (a letter describing your efforts to obtain the signed copy) to the EPA Region 5 Administrator.

You may receive a Certificate of Disposal from the designated facility or a subsequent facility documenting the disposal of your PCB waste. If you do, keep it with your manifest copies.

When shipping only PCBs, you do not need to send a copy of the hazardous waste manifest to the MPCA or Metropolitan County hazardous waste programs.

More information

Guidance and requirements in this fact sheet were compiled from the Code of Federal Regulations, Chapter 40, Part 761, and Minnesota Rules, Chapter 7045. Visit the U.S. Government Printing Office at <http://www.gpo.gov/fdsys/> to review the Code of Federal Regulations directly. Visit the Office of the Revisor of Statutes at <https://www.revisor.mn.gov/pubs> to review the Minnesota Rules.

Minnesota Pollution Control Agency

Toll free (all offices) 1-800-657-3864
Brainerd 218-828-2492
Detroit Lakes..... 218-847-1519
Duluth 218-723-4660
Mankato 507-389-5977
Marshall 507-537-7146
Rochester..... 507-285-7343

St. Paul 651-296-6300
Willmar 320-214-3786
Website <http://www.pca.state.mn.us>

U.S. Environmental Protection Agency

Toll free (Region 5) 1-800-621-8431
TSCA Hotline 202-554-1404
Website <http://www.epa.gov>