



Recordkeeping for PCBs

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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.

Who must keep PCB records?

Those who must keep PCB records include:

- Owners of equipment containing PCBs
- Generators of PCB wastes
- Commercial storers of PCBs

- Permitted TSCA or hazardous waste storage or disposal facilities who manage PCBs

Owners of electrical or other equipment are the generators of PCB waste, even though they may hire another party to maintain that equipment. Owners must keep the records discussed in this document. For example, if a municipal utility contracts with an unrelated rural electric cooperative to maintain its distribution system, the utility is responsible for keeping records.

Unlike hazardous waste records, PCB records need not be kept at the site where the waste is generated. However, the records must be in the possession of the generator and responsible personnel must be aware of the location. PCB commercial storers, however, must keep their records at the storage site.

What PCB records should one keep?

Seven general types of PCB records may be required for most PCB sites:

1. Documentation that equipment in use, stored, or disposed of is or was Non-PCB
2. Storage-for-Reuse records
3. Copies of hazardous waste manifests used to ship PCBs
4. Certificates of Disposal
5. Inspection records
6. Spill cleanup records
7. Annual Document Logs

Find the details on each of these below. Commercial storers of PCBs are required to maintain additional records.

Documentation for Non-PCB equipment

Keep records documenting equipment as Non-PCB, including reclassification records, for at least three years after you sell or dispose of the equipment. Since liability for improper disposal of PCBs may extend indefinitely, the MPCA recommends keeping a copy of these records for the life of your business.

For more information on documenting equipment or wastes as Non-PCB, see MPCA hazardous waste fact sheet #4.48a, Identification, Use, and Management of PCBs, available on the MPCA's [hazardous waste publications](#) Web page.

Storage for Reuse records

If you are storing *working* equipment in good condition for future use, whether you know or assume it contains PCBs, not in a permanent PCB storage area, you must prepare a storage for reuse record. Maintain these records until you return the equipment to service or dispose of it.

For more information on storage for reuse records, see MPCA hazardous waste fact sheet #4.48c, Storing PCBs, available on the MPCA's [hazardous waste publications](#) Web page.

Manifests

PCB waste generators must keep a copy of each manifest signed by the PCB transporter until they receive the copy signed by the designated facility. Then:

- **Generators not subject to the Annual Document Log requirement** – keep the facility-signed manifest copy for three years from the date of shipment.
- **Generators required to prepare an Annual Document Log** – keep the facility-signed copy signed for the same length of time as you retain the Annual Document Log.
- **Commercial storers of PCBs** – keep a copy of each manifest you sign as the designated facility for three years after you cease operating as a commercial storer. For shipments of PCBs from their facility, a commercial storer must follow the requirements for generators.

For information on preparing PCB manifests, see MPCA hazardous waste fact sheet #4.48d, Manifest & Dispose of PCBs, available on the MPCA's [hazardous waste publications](#) Web page.

Certificates of Disposal

Within 30 days of disposal, PCB disposal facilities are required to send a Certificate of Disposal to PCB waste generators documenting the final disposal of their waste. Then:

- **Generators not subject to the Annual Document Log requirement** are not required to keep Certificates of Disposal; however, the MPCA recommends keeping them for at least three years from the date of disposal.
- **Generators required to prepare an Annual Document Log** – keep the Certificate of Disposal for the same length of time you retain the Annual Document Log.

Inspection records

You may be required to maintain either one or both of two types of PCB inspection records:

1. Inspections of permanent PCB storage areas
2. Inspections of PCB equipment in use or storage for reuse

Inspections of Permanent PCB Storage Areas

Keep records of the inspections performed every 30 days of any items in a permanent PCB storage area. There is no specified format for these records. Then:

- **Generators not subject to the Annual Document Log requirement** – keep these records for at least one year from the inspection date.
- **Generators required to prepare an Annual Document Log** – keep these inspection records for the same length of time as you keep the Annual Document Log.

For more information on permanent PCB storage area inspection and other requirements, see MPCA hazardous waste fact sheet #4.48c, Storing PCBs, available on the MPCA's [hazardous waste publications](#) Web page.

Inspections of PCB equipment in use or storage for reuse

Keep records of the inspections performed of PCB equipment in use or storage for reuse. Inspect:

- every 30 days if the equipment is untested or known to contain 60,000 parts per million (ppm) or more PCBs
- every 12 months if the equipment is known to contain less than 60,000 ppm PCBs or if 100% secondary containment is provided

There is no specified format for these records. Retain these inspection records for three years after disposing of the equipment.

For more information on identifying PCB equipment and its inspection requirements, see MPCA hazardous waste fact sheet #4.48a, Identification, Use, and Management of PCBs, available on the MPCA's [hazardous waste publications](#) Web page.

PCB spill clean-up records

Keep records of all PCB spills and cleanup activities for at least five years after the completion of the cleanup. At a minimum, these records must include:

- Estimated or known date and time of the spill
- Location of the spill
- Source of the spill, including type and identification of equipment, if known
- Pre-cleanup data used to establish spill boundaries
- Description of solid surfaces cleaned and method used
- Description of soil and debris removed, including depth of excavation and total amount
- Post-cleanup data used to verify complete cleanup of the spill or a certification statement signed by an authorized representative of the responsible party stating that cleanup requirements have been met and that the information contained in the cleanup record is true to the best of their knowledge.

For more information on cleaning up and documenting PCB spills, see MPCA hazardous waste fact sheet #4.48g, PCB Spill Cleanup Policy, available on the MPCA's [hazardous waste publications](#) Web page.

Annual Document Logs

Preparation thresholds

Commercial storers must prepare PCB Annual Document Logs every year.

Generators must prepare PCB Annual Document Logs if, during a calendar year, they used, stored, or disposed of:

- 45 kilograms or more of PCBs, concentration 50 ppm or greater, in a container or in bulk – such as in a drum or tank.

Note: 45 kilograms is approximately 99 pounds of solid material or 12 gallons of mineral oil or 8 gallons of high density dielectric fluid.

If your disposal vendor pumps out your equipment containing PCBs on site to a container or tank, you will likely exceed this threshold.

- one or more PCB transformers
- 50 or more PCB large capacitors (contain 3 pounds or more of fluid).

Prepare Annual Document Logs by July 1st for the previous calendar year. Retain for at least three years after:

- **For generators**, the last year in which any of the above thresholds were met
- **For commercial storers**, the last year you accepted waste from other facilities

Required contents for all preparers

All Annual Document Logs must contain at least the following information:

- Hazardous Waste Identification Number (HWID) assigned to the facility. The HWID is also known as an Environmental Protection Agency identification number (EPA ID#). Any facility generating or storing PCBs in Minnesota must obtain a HWID. For more information on obtaining a HWID, see MPCA hazardous waste fact sheet #1.02, [Obtain a Hazardous Waste Identification Number](#), available on the MPCA's [hazardous waste publications](#) Web page.
- Name of the facility – the name should match the name assigned to the HWID.
- The physical address of the facility – if the mailing address of the facility is different from the physical address, the MPCA recommends including it also.
- The unique manifest numbers of all hazardous waste manifests used to ship PCBs to or from the facility during the calendar year, and, if not you, the name and address of the facility that generated the manifest
- Record of each telephone call, e-mail, or other communication with the designated facility during the calendar year to confirm its receipt of PCBs transported by an independent transporter

Required content for equipment in use or storage for reuse

If you have PCB equipment in use or storage for reuse at the end of the calendar year, you must include the:

- Total number and weight of PCB transformers and PCB voltage regulators

- Total number of PCB large capacitors
- Total weight and type of PCBs in containers

Required content for equipment disposed of or in storage for disposal

For all PCBs disposed of during the calendar year, or in storage for disposal at the end of the calendar year, include the:

- Serial number or other unique identifying number for each item, container, or bulk load containing PCBs
- Description of each item or waste in a container or bulk load
- Weight in kilograms of each item, container, or bulk load containing PCBs

Note: Oil-filled equipment being disposed which has been verified through testing as only PCB-Contaminated or less and from which all fluid has been drained may be managed equivalent to Non-PCB items. Such equipment need not be included in the Annual Document Log, however the drained fluid is a regulated PCB-Contaminated waste and must be included as a container or bulk load.

- Date the item, or first date any PCBs in a container or bulk load, was removed from service

Note: The date removed from service for PCBs is the date the equipment in which the PCBs were contained was de-energized or disconnected from a distribution system. It is *not* the date you decided to dispose of the equipment or the date you shipped the PCBs or equipment off site. For PCBs other than equipment, such as sampling waste, the date removed from service is the date the waste was generated.

- Date each item, container, and bulk load was shipped off site for disposal, if applicable
- Date of final disposal of PCBs at the destination facility, if applicable
- Total number of items, containers and bulk loads of PCBs shipped off site during the calendar year
- Total weight in kilograms of PCBs shipped off site during the calendar year

More information

The MPCA and EPA have staff available to answer your PCB management questions. For more information, contact 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

U.S. Environmental Protection Agency, Region 5

Toll free (from Minnesota)..... 1-800-621-8431
 Web site..... www.epa.gov/region5/

U.S. Environmental Protection Agency, Headquarters

TSCA Hotline..... 202-554-1404
 Web site..... www.epa.gov

To access hazardous waste documents on the Minnesota Pollution Control Agency Web site, 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.
