

# Recordkeeping for 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>

## What PCBs-related records must be kept?

- [Documentation that equipment in use, in storage for reuse, and disposed is or was Non-PCB](#)
- [Storage for reuse records](#)
- [Inspections](#)
- [Manifests and attachments used to ship waste PCBs](#)
- [Certificates of Disposal](#)
- [Spill cleanup](#)
- [Annual Document Logs](#)

## Documentation that equipment is or was Non-PCB

Electrical power distribution equipment in use, in storage for reuse, or disposed must be assumed to contain PCBs unless you have documented that the equipment is Non-PCB. Keep records documenting equipment as Non-PCB for at least three years after you dispose of or sell the equipment.

For more information on documenting equipment as Non-PCB, 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>

## Storage for reuse records

You may store equipment in working condition ready to use, or scheduled for repair, that you affirmatively intend to use, for up to five years without storing it in a Permanent PCBs Storage Area if you prepare a record, sometimes called a Storage for Reuse Plan. Keep reuse records until you put the equipment back in use, or, if you dispose of the equipment without putting it back in use, for the same length of time as the shipment manifest for the equipment.

For more information on storing equipment for reuse, see MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>

## Inspections

Permanent PCB Storage Areas must be inspected at least every 30 days when PCBs are present. For more information about Permanent PCB Storage Areas, see MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>

- If you are required to prepare a [PCB Annual Document Log](#) for the year of the inspection, keep the storage area inspection record for the same period as the PCB Annual Document Log.
- If you are not required to prepare a [PCB Annual Document Log](#), keep the storage area inspection record for at least one year from the date of the inspection.

PCB Transformers in use or in storage for reuse must be inspected:

- Quarterly, if untested or if they contain  $\geq 60,000$  parts per million (ppm) PCBs.
- Annually, if they contain  $< 60,000$  ppm PCBs or  $\geq 100\%$  secondary containment is provided.

Keep PCB Transformer inspection records for at least three years after you dispose of or sell the transformer.

## Manifests and attachments used to ship waste PCBs

Ensure a Uniform Hazardous Waste Manifest is prepared for all shipments of waste PCBs from your site to any other entity except a related company. For more information, see MPCA fact sheet #w-hw4-48d, Manifesting and disposing of PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48d.pdf>

Keep a copy of the manifest signed by you and the transporter, commonly called a *two-signature copy*, until you either receive a printed copy signed by the receiving facility, commonly called a *three-signature copy*, or have verified that the three-signature copy is available in the U.S. Environmental Protection Agency's (EPA) *eManifest system*. For instructions on accessing the eManifest system, 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 verified that all waste PCBs information required in MPCA fact sheet #w-hw4-48d, such as dates removed from service and, if applicable, serial numbers, is visible on the manifest copy in the EPA's eManifest system, you do not need to keep further manifest records.
- If required waste PCBs information is either not visible on the manifest copy in the EPA's eManifest system, or you have not verified that the three-signature copy is available in the eManifest system, then you must retain the three-signature copy of the manifest, together with all attachments showing the required waste PCBs information for at least three years from the date of shipment, or three years from the last [PCB Annual Document Log](#) required for your site, whichever is later.

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>

## Certificates of Disposal

The ***Certificate of Disposal*** is the record from the facility actually disposing of your waste PCBs, such as by incineration, detoxification, or landfilling, that your waste PCBs have been disposed. Certificates of Disposal may be printed or may be an electronic record in an EPA-approved system for Certificates of Disposal maintained by the disposal facility.

- If your disposal facility maintains an EPA-approved system, and you have an account to access the system, you do not need to keep further Certificate of Disposal records.
- If you are required to prepare a [PCB Annual Document Log](#) for the year the disposal date is in, and your disposal facility does not maintain an EPA-approved system, keep printed Certificates of Disposal for at least three years from the last required [PCB Annual Document Log](#).
- If you are not required to prepare a [PCB Annual Document Log](#) for the year the disposal date is in, you are not required to keep Certificates of Disposal.

## Spill cleanup

For more information about records of spills and cleanup of PCBs, see MPCA fact sheet #w-hw4-48g, Responding to leaks and spills of PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48g.pdf>

Keep PCBs spill cleanup records for at least five years from the date of the spill.

## Annual Document Logs

The purpose of the PCB Annual Document Log is to effect a review of key PCBs-related records during years of potential elevated risk by requiring the preparer to compile a new document with data elements from each of the key records. PCB Annual Document Logs must be prepared by July 1<sup>st</sup> for the previous calendar year. Keep PCB Annual Document Logs for at least three years after the last year you were required to prepare one. Do not submit PCB Annual Document Logs to the MPCA unless requested.

Commercial storers of PCB waste must prepare a PCB Annual Document Log for each calendar year. For more information about commercial storers of PCB waste, see MPCA fact sheet #w-hw4-48c, Storing PCBs, at: <https://www.pca.state.mn.us/sites/default/files/w-hw4-48c.pdf>

Generators of waste PCBs, such as electrical utilities, must prepare a PCB Annual Document Log for any calendar year in which they use or store at any one time:

- ≥45 kilograms (kg) (or about 12 gallons of transformer oil, or 99 pounds of solids) of PCBs in a PCB Container.

**Caution:** If your PCBs disposal vendor pumps the oil out your equipment into a container such as a drum or tanker truck at your site, you are storing those PCBs in a PCB Container. If the combined volume of any one such *pumpout* is more than 45 kg, you will trip this trigger.

- Any PCB Transformers.

### A PCB Annual Document Log must include:

- Hazardous Waste Identification Number (HWID, also known as an EPA ID#)
- Name of the site
- Physical address of the site
- Manifest numbers from all [manifests for waste PCBs](#) shipped from or received at the site
- For each PCB Article, such as a PCB-Contaminated Transformer or oil-filled bushing, and for each PCB Container, such as a drum of spill cleanup debris, shipped off-site for disposal during the calendar year, or that is in storage for disposal at the end of the year:
  - Serial number, or for PCB Containers, a unique identifying number you assign
  - Weight in kg
  - Date removed from service, or for PCB Containers, the earliest date removed from service of the waste in the container.  
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>
  - Date shipped off-site, if applicable
  - Date of actual disposal, meaning incineration, detoxification, or landfilling
- Total number and total weight in kg of all PCB Articles and PCB Containers disposed during the calendar year, or that is in storage for disposal at the end of the year
- Number of PCB Transformers remaining in use or storage for reuse at the end of the year
- Total weight in kg of the PCB Transformers remaining in use or storage for reuse

## 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

[tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov)

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