1.0 Purpose

Minimum requirements have been established for removal and disposal of leaking PCB ballasts or other containing products. Prior to 1979, potential sources of PCBs were light ballasts; transformers; capacitors; industrial and commercial applications including electrical, heat transfer, and hydraulic equipment; as plasticizers in paints, plastics and rubber products; in pigments, dyes, and carbonless copy paper; and many other products. This procedure does not apply to non leaking ballasts

2.0 Departments

Contracting – responsible for issuing the O&M contract
Property Management – responsible for overseeing the O&M contractor

3.0 Form Used

Waste Manifest form (see Section 7.4 below)

4.0 References

Colorado Department of Public Health and Environment (CDPHE), Compliance Bulletin, Hazardous Waste, Lighting Waste, August 2002

CDPHE, Treatment of Hazardous Waste by Generators Guidance Document, April 2000

CDPHE, Hazardous Waste Commission, 6 CCR 1007-3, Regulations under Part 260-279

EPA, 40 CFR 302, Release of PCBs excess of a Reportable Quantity; 40 CFR 761, Use Restrictions; 40 CFR 761.60, Disposal; 40 CFR 761.120 PCB spill clean up policy and 49 CFR 171-178, Transportation.

O&M contract – Each O&M contractor has a separate contract. Contact the building's Property Manager for a list of PCB containing materials within the building.

5.0 Acronyms, Abbreviations, and Definitions

CDPHE	Colorado Department of Public Health and Environment
CERCLA	Comprehensive Environmental Compensation & Liability Act
CFR	Code of Federal Regulations
COR	Contracting Officers Representative
DFC	Denver Federal Center
DOT	Department of Transportation
EPA	Environmental Protection Agency
O&M	Operations and Maintenance
PCB	Polychlorinated Biphenyls

PM	Preventative Maintenance
ppm	parts per million: A unit of concentration, 1 ppm corresponds to one part pollutant per one million parts of the gas, liquid, or solid medium
RCRA	Resource Conservation and Recovery Act
TSCA	Toxic Substance Control Act

6.0 Exclusions

None

7.0 Procedure

7.1 **Removal**. There is no requirement that small capacitors, including light ballast, be taken out of service. At the end of their useful lives they should be replaced with non-PCB items. Leaking ballasts should be placed in appropriate containers as described in the DOT Regulation 49 CFR -173.3 Subpart A. The containers shall be marked and stored in accordance with 40 CFR 761.40 & 40 CFR 761.65. The same containers shall be used for shipment. A waste manifest form is required when transporting PCBs or PCB contaminated material for storage or disposal. Call the Region 8 Environmental Manager of the Environmental Program Groups to obtain the names of the GSA associates authorized to sign the manifest.

No GSA associate shall clean up PCB spills. A qualified contractor with the proper training shall be obtained to clean-up any type of PCB spill. The Contractor shall wear appropriate PPE. A wipe sample shall be taken by the qualified contractor to document the spill has been adequately cleaned. A copy of the laboratory report shall be provided to the Regional Safety Officer.

Non leaking PCB ballasts may be disposed as municipal solid waste. The disposal site shall be notified and acknowledge their approval prior to disposing of the non leaking ballasts.

7.2 **Storage**. PCB storage areas must be marked with EPA approved lables. PCB containing items may not be stored for more than one year prior to disposal.

7.3 **Disposal**. Wastes containing PCBs in concentration greater than 50 ppm must be disposed of at a TSCA- authorized facility.

7.4 **Transportation.** PCB wastes disposed of at TSCA authorized facilities must be manifested with a Uniform Hazardous Waste Manifest which is a form prepared by all generators who transport, or offer for transport, hazardous waste for off-site treatment, recycling, storage, or disposal. Currently, the manifest is a paper document containing multiple copies of a single form. When completed, it contains

information on the type and quantity of the waste being transported, instructions for handling the waste, and signature lines for all parties involved in the disposal process. The manifest is required by both Department of Transportation and EPA. Each party that handles the waste signs the manifest and retains a copy for themselves. This ensures critical accountability in the transportation and disposal processes. Once the waste reaches its destination, the receiving facility returns a signed copy of the manifest to the generator, confirming that the waste has been received by the designated facility.

Certificates of destruction must be obtained from TSCA authorized facilities and kept for a minimum of three years. DOT labeling and packaging requirements apply to all PCB shipments. Ensure that materials are transported by an authorized hauler. Copies of the manifest and certificate of destruction shall be provided to the Environmental Manager.

7.5 **Releases and Release Reporting**. Concentrations of PBCs greater than or equal to 50 ppm must be remediated in accordance with EPA's PCB Spill Cleanup Policy. Release involving more than 1 pound of PCBs over a 24-hour period must be reported to the National Response Center @ 1-800- 424-9346 (See GSA Technical Guide 203 Superfund Requirements).

7.6 **Maintain Documentation**. Property Management Personnel shall develop and maintain an inventory of PCB items at each facility. Ensure copies of the waste manifest and certificates of destruction are provided to the Environmental Manager. Retain laboratory analysis reports. Document properties with PCB containing materials in the WEB-Environmental Risk Index

8.0 Records

Inventory of PCB items at each facility
Waste manifests
Certificates of destruction
Laboratory analysis reports
EPA letter Ref: 8P-P3T, no date