



EPA-305-X-04-002

Polychlorinated Biphenyl Inspection Manual

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Office of Compliance
Office of Enforcement and Compliance Assurance
U.S. Environmental Protection Agency
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<http://www.epa.gov/compliance/resources/publications/monitoring/manuals.html>

Appendix L

Alternative Disposal Methods

For PCBs and PCB Items

Approval Requirements §761.60

In accordance with Section 761.60(e), the Regional Administrator (or the Director of NPCD) may approve of the request for the use of an alternative method, at her/his discretion, if s/he makes the following findings:

- That the alternative method will destroy PCBs as efficiently as does an approved incinerator (under Section 761.70) or a high efficiency boiler. §761.71
- That the alternative method of destroying PCBs will not present an unreasonable risk of injury to health or the environment. §761.60(e)

The Regional Administrator (or the Director of NPCD) must state the approval of any alternative method in writing. It may contain appropriate conditions and limitations as deemed appropriate by the approval authority. The inspector should obtain the facility's approval document and refer to it during the inspection. The inspector should verify compliance with the approval as well as the regulations.

Since §761.60(e) approvals have a variety of technologies, the best sources of information are found by reading the approval and talking to the permit writer. Please note that some of the §761.60(e) approvals are Regional while other approvals may be mobile, or located in more than one Region (i.e., a National approval). To avoid confusion, it is best to determine whether the approval is Regional or National. If it is a National approval, the inspector may want to contact other Regions for possible violations or contact EPA Headquarters Enforcement.

The recycling of PCB fluorescent light ballasts is covered in this section. Ballast recyclers reclaim metals (e.g., sheet steel, high silicon steel, copper, aluminum) from ballast components. Facilities may not recycle leaking ballasts and must properly dispose of them.

The recycling process typically involves freezing the ballast to embrittle the potting compound, separating the metal case to allow the ballast core with capacitor to drop out, and cutting the leads to the capacitor, which contains PCBs and is regulated for disposal, from the transformer core. The frozen potting material encased transformer core is then struck on the edge of a fixed metal bar located over a waste collection drum or on the edge of the drum to shatter the brittle

potting material allowing the brittle material to drop into the waste container. Any potting material still adhering to the core is crumbled off with gloved hands and/or removed with an air driven chisel or needle gun. The metal recovery activity scatters potting material far and wide. To insure that PCBs are not released from the decontamination area to the environment, the activity should be conducted within an enclosure equipped with walls, roof, and energy saving type strip doors at personnel and material ingress and egress points. Workers should also be protected against dermal contact and inhalation of PCB containing materials with disposable painter's breathing masks, eye protection, gloves, and coveralls.

In addition to alternative approval for disposal, ballast recyclers usually have EPA approval as a Commercial TSCA storer for storing the incoming ballasts and the PCB wastes generated by the recycling process. If the facility has EPA Commercial Storer approval, the inspector should collect copies of at least the last 12 months of manifests and bills of lading, which can be used to determine if the facility at any time exceeded their approved storage capacity.

When inspecting a PCB fluorescent light ballast recycler, the inspector should make sure that PCB wastes are contained within the work area and not allowed to migrate to other areas of the facility or outside of the facility.

The inspector should visually inspect or collect samples of recovered metals. Unrestricted use decontamination standards for non-porous surfaces previously in contact with non-liquid PCBs for unrestricted use are:

- #10 ug/100 cm² as measured by standard wipe test, or
- Visual Standard No. 2, Near White Blast Cleaned Surface Finish of the National Association of Corrosion Engineers (NACE) as verified by visual inspection of all cleaned areas.

The decontamination standards for disposal in a smelter meeting specified standards under §761.72 are:

- #100 ug/100 cm² as measured by standard wipe test,
- or Visual Standard No. 3, Commercial Blast Cleaned Surface Finish of NACE as verified by visual inspection of all cleaned areas.

Notice Requirements §761.60

Owners and operators of an incinerator, a chemical waste landfill, or an approved alternative disposal facility must give the following written notices to the State and local governments where the facility is located:

- Notice at least 30 days before a facility is first used for disposal of PCBs.
§761.60(f)(1)(i)

- At the request of any State or local government, annual notice (given no more than 30 days after the end of the year covered) of the quantities and general description of the PCBs disposed of during the year. §761.60(f)(1)(ii)
- To avoid confusion, inspectors should check if facility has Regional Approval versus Nationwide Approval.

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