What is a PCB Device?
A PCB device contains PCBs at concentrations > 500 parts per million (ppm). A PCB-Contaminated device is one containing amounts ≥ 50 and ≤ 499 ppm PCBs. These devices are also subject to EPA’s regulations.

Labels:

- Proper PCB identification labels must be affixed to the access to the transformers and the transformer itself. The identification must be displayed in a place where it is easily visible.
- When analytical results identify an item's PCB concentration, the concentration should be written in permanent ink on the label. When the equipment is determined to have a concentration of less than 50-ppm PCBs, a "Non-PCB" label should be affixed to the equipment. Labeling is also required for materials that do not contain PCBs at all.
- Once a PCB item has been removed from service, the PCB Article or Container should be labeled with the date when it was removed from service.

Recordkeeping:

- Records of inspections and maintenance must be maintained.
- Annual documents and annual document logs describing the inventory and disposition of PCB Transformers and other PCB Equipment must be kept.
- All records for inspections and annual documents must be retained for a minimum of three (3) years after the last PCB Item has been disposed of.

Spills

- When spills with low concentrations (less than 500 ppm PCBs) and less than 454 g (1 lb.) of PCBs occur, all soil within the spill area (visible boundary plus a 1-latereal-ft buffer zone) must be excavated and backfilled with clean soil. The contaminated soil must be disposed of as hazardous waste. Solid surfaces must be double washed/rinsed. This action must be completed within 48-hours after the owner of PCBs or PCB items was notified or became aware of the spill.
- When spills with high concentrations (500 ppm or more PCBs) or more than 454 g (1 lb.) of PCBs occur, the National Response Center must be notified immediately. The spill area must be cordoned off with at least a 3-ft buffer zone. Warning signs must be clearly visible. The area of visible contamination must be documented and recorded, noting the extent and center of the visible trace areas. The cleanup of fluid from hard surfaces and the removal of contaminated soil must be initiated (not necessarily completed) within 24 hours after the Responsible Individual was notified or became aware of the spill.

If a PCB spill occurs in your facility, you must report the spill within 24 hours to the EPA Region 3 Emergency Response Section (215-814-3255), the National Response Center (800-424-8802), and the Philadelphia Water Department Municipal Dispatcher (215-686-4514/15). Immediately take control measures for the spread of the spill by damming or absorbing the leak, using absorbent materials, and cordon off the area. Cleanup must be initiated within 48-hours of the spill. A licensed PCB cleanup contractor may be called to clean up the spill.

If you have any questions or comments please call Ms. Jennifer L. Moore at 215-685-6085.

References:
1. www.epa.gov/compliance/resources/publications/assistance/sectors/constructmyer,
2. www.llnl.gov/es_and_h/hsm/doc_14.14/doc14-14,
3. www.unm.edu/~sheaweb/sheamanual/envprot/PCB.htm,
4. www.epa.gov/reg3wcmd/pcbs.htm