PCB Management

BRIEF

Policy Summary

The Berkeley Lab Polychlorinated Biphenyl (PCB) policy requires personnel to identify, label, and properly dispose of electrical equipment that contains or could contain PCBs.

Who Should Read This Policy

Berkeley Lab employees, visitors, affiliates, and subcontractors who work with or operate electrical equipment that contains or could contain PCBs

To Read the Full Policy, Go To:

The POLICY tab on this wiki page

To Read the ES&H Program Details, Go To:

http://www.lbl.gov/ehs/pub3000/CH63.html

Contact Information

Polychlorinated Biphenyls Subject Matter Expert
Environmental Services Group
EHSS Division

Waste Management (Hazardous) Subject Matter Expert
Waste Management Group
EHSS Division

POLICY

A. Purpose

The Berkeley Lab Polychlorinated Biphenyl (PCB) policy requires personnel to identify, label and properly dispose of electrical equipment that contains or could contain PCBs.

B. Persons Affected

Berkeley Lab employees, visitors, affiliates, and subcontractors who work with or operate electrical equipment
C. Exceptions
None

D. Policy Statement

1. Berkeley Lab will treat all liquid-filled electrical equipment with unknown content as containing PCBs.
2. Berkeley Lab Waste Management will handle transportation and disposal of all disconnected and unused electrical equipment.
3. Berkeley Lab employees are encouraged to purchase dry electrical equipment or otherwise label equipment known to be free of PCBs as such to minimize future hazardous waste. (Work Process A)

E. Roles and Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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</table>
| Principal Investigators and Supervisors | • Ensure that environmental laws, regulations, and policies are followed  
• Request assistance from the Environmental Services Group within the EHSS Division for technical advice on what environmental requirements apply to their operations and what would be an appropriate compliance strategy  
• Provide training for employees in operational requirements pertaining to environmental protection, and maintain records of such training (e.g., generator training)  
• Ensure that activities are performed within acceptable operating standards and that any required records (e.g., training records) are current  
• Notify the EHSS Division immediately of any unplanned or accidental releases  
• Contact the Waste Management Group within the EHSS Division in the early planning stages before PCB-contaminated oil-filled electrical equipment is disconnected for disposal |
| Employees                     | • Follow applicable environmental laws, regulations, and policies  
• Must be fully aware of the environmental impact of their activities, and comply with all requirements that govern those activities  
• Perform activities within acceptable operating standards, and maintain current records whenever required  
• Take immediate action to stop unplanned releases to the environment, and report all instances of unplanned environmental releases to the EHSS Division  
• Complete all required training (e.g., generator training) provided by supervisors and the EHSS Division |
| Environmental Services Group  | • Develops Laboratory policies and procedures to ensure that operations are conducted in an environmentally safe manner and in full compliance with all applicable environmental laws and regulations and DOE orders  
• Assesses current and planned Berkeley Lab programs, and assists in defining environmental protection compliance upgrades and corrective actions  
• Participates in discussions regarding PCB management matters with Berkeley Lab employees and regulatory agencies  
• Curtails or suspends any operations that pose an immediate danger to members of the public or the environment  
• Monitors laboratory discharges to the sanitary sewer to verify compliance with applicable regulations and EBMUD permits  
• Investigates reports of unplanned environmental releases, and notifies federal, state, and local authorities in a timely manner, as required |
| Waste Management Group        | • Picks up and disposes of PCB waste from Laboratory generators  
• Establishes, as needed, a Satellite Accumulation Area or Waste Accumulation Area for PCB contaminated oil-filled electrical equipment destined for disposal |

F. Definitions/Acronyms

<table>
<thead>
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<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Department of Toxic Substances Control (DTSC)</td>
<td>The department within the California Environmental Protection Agency that regulates hazardous waste management, including PCB waste, and remedial actions</td>
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<tr>
<td>East Bay Municipal Utility District (EBMUD)</td>
<td>The local municipal wastewater treatment facility that accepts and regulates sanitary-sewer discharges from Berkeley Lab</td>
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### Effluent
Any treated or untreated liquid discharge from Berkeley Lab or from a Berkeley Lab facility.

### Environmental monitoring
The collection and analysis of sanitary sewer samples for the analysis of PCB congeners for determining compliance with EBMUD permits.

### Environmental occurrence
Any sudden or sustained deviation from a regulated or planned performance at an operation with environmental protection and compliance significance.

### Hazardous wastes
Wastes exhibiting any of the following characteristics: ignitability, corrosivity, reactivity, and toxicity. In addition, EPA has listed specific wastes as hazardous that do not necessarily exhibit these characteristics.

### Large capacitor
A capacitor that contains more than 3 pounds or 30 liquid ounces of dielectric fluid.

### Pollution prevention
Reducing or eliminating waste at the source by modifying production processes, promoting the use of nontoxic or less-toxic substances, implementing conservation techniques, and reusing materials rather than putting them into the waste stream.

### Public Owned Treatment Works (POTW)
A general term used for sewage-treatment plants. The East Bay Municipal Utility District plant is the POTW that accepts sewage from Berkeley Lab. The EBMUD permit sets a discharge limit for PCB congeners.

### San Francisco Regional Water Quality Control Board
The agency responsible for regulating the water quality in the San Francisco basin and setting discharge limits for POTWs, including the limit for PCB congeners.

### U.S. Environmental Protection Agency (EPA)
A federal agency responsible for enforcing environmental laws. In California, some of this responsibility is typically delegated to state and local regulatory agencies.

### Waste minimization
The U.S. EPA as measures that reduce the volume and toxicity of hazardous waste disposed to landfills. California defines "waste minimization" as measures that reduce, eliminate, or recycle hazardous waste at the point in a process where such waste may be generated.

### G. Recordkeeping Requirements
Waste manifests are maintained by the Waste Management Group.

### H. Implementing Documents

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<thead>
<tr>
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<tr>
<td>07.09.013.001</td>
<td>Polychlorinated Biphenyl (PCB) Management</td>
<td>Program</td>
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<tr>
<td>07.09.013.002</td>
<td>Work Process A, General Requirements</td>
<td>Process</td>
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<td>07.10.002.001</td>
<td>Waste Management</td>
<td>Program</td>
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<tr>
<td>07.09.012.001</td>
<td>Contaminated Soil and Groundwater</td>
<td>Program</td>
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<tr>
<td>07.09.007.001</td>
<td>Stormwater Discharge</td>
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### I. Contact Information

**Polychlorinated Biphenyls Subject Matter Expert**  
Environmental Services Group  
EHSS Division

**Waste Management (Hazardous) Subject Matter Expert**  
Waste Management Group  
EHSS Division

### J. Revision History

<table>
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<tr>
<th>Date</th>
<th>Revision</th>
<th>By whom</th>
<th>Revision Description</th>
<th>Section(s) affected</th>
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<td>5/14/2013</td>
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