

Yale University
Environmental Health and Safety
Environmental Affairs Section

Polychlorinated Biphenyls (PCBs) Guidance Document for Contractors

A. Regulatory Status

1. Items/materials presumed to contain ≥ 50 ppm PCBs or tested and determined to contain ≥ 50 ppm PCBs such as PCB ballasts, PCB caulk, PCB paint, PCB mastic, PCB contaminated construction debris, PCB contaminated PPE, PCB contaminated soil, and PCB contaminated liquid MUST be disposed of by Environmental Health and Safety (EHS).
 - All waste is shipped off-site for disposal.
 - A hazardous waste or non-hazardous waste manifest must be used, as applicable.
 - Manifests may only be signed by a designated member of the Environmental Affairs Section (EAS) of Environmental Health and Safety (EHS) at Yale University (203-432-6545).

B. Container Management

1. PCB ballasts, PCB caulk, PCB paint, PCB mastic, PCB contaminated construction debris, PCB contaminated PPE, PCB contaminated soil, and PCB contaminated liquid are to be stored in Department of Transportation (DOT) approved containers that are compatible with the material to be stored and that can be securely closed.
 - Containers from 30 gallons to 1 cubic yard are provided by EAS. Please allow 3-5 business days for the delivery of containers.
 - The delivery and removal of roll-off containers MUST be scheduled by EAS to ensure regulatory compliance. Please call the RCRA Compliance Officer at 203-432-9384 to coordinate the delivery and removal of roll-off containers. Please allow 3-5 business days for the delivery and removal of the containers.
2. Ensure each container holding solid PCB waste is labeled with the words "Non-Hazardous Waste" and "Ballasts containing Polychlorinated Biphenyls," "Soil containing Polychlorinated Biphenyls," or "Debris containing Polychlorinated Biphenyls," as applicable. Each container holding PCB waste must also be labeled with the large PCB mark found in [40 CFR 761.45](#).
3. Ensure each container holding PCB contaminated liquid is labeled with the words "Non-Hazardous Waste" or "Hazardous Waste," as applicable, and "Polychlorinated Biphenyls" plus all specific chemical contents of the liquid. Each container holding PCB contaminated liquid must also be labeled with the large PCB mark found in [40 CFR 761.45](#).

4. Ensure each container is marked with an out-of-service date (the date waste is first placed in the container).
5. Keep each container closed when waste is not being added.
6. If plastic bags are used to collect solid PCB waste, each plastic bag must be labeled as described above. If any plastic bags are torn, they must be placed into a fully intact plastic bag. Ensure each bag is taped securely shut before placing into a DOT approved container.
7. All containers of liquid PCB waste must be stored on spill containment pallets/decks with a roof above or in a commercially available secondary containment structure with a ramp. Contractors shall consult with EHS to ensure that spill containment pallets/decks or commercially available secondary containment structures that they provide are compliant.
8. Cubic yard boxes and smaller containers must be stored in a secure, dry area away from public access. Roll-offs must be stored on Yale University property and in a secure area away from public access, whenever possible.
9. Submit an online [Construction Waste Supply/Removal Request Form](#) to EHS for delivery and removal of containers.

C. Other Important Notes

1. Weekly inspections of the containers shall be carried out by a member of EAS.
2. Daily inspections of the work areas should be done by the site manager to assure no PCB waste has spilled on the ground, that any spills are promptly cleaned up, and that all containers are closed and properly marked.
3. Spill cleanup materials are to be provided by the contractor and should include:
 - Plastic bags
 - Rolls of tape
 - Rakes
 - Broom and dustpan
 - Vacuum cleaner with HEPA filter
4. In the event of a spill of PCB waste, the following should be notified:
 - Yale Environmental Health and Safety emergency number (203-785-3555)
 - Company performing the PCB removal

5. If any regulatory agency should come on site (OSHA, CTDPH, CTDEEP, EPA)
 - Ask the representative to wait until a member of EHS arrives
 - Contact EHS immediately (203-785-3555) with the name of the representative and the agency
 - DO NOT deny the representative access to the site, but request that the inspectors await the arrival of an EHS representative
6. All inquiries pertaining to the storage and/or disposal of PCB waste should be directed to the RCRA Compliance Officer at 203-432-9384.