

BALLAST GUIDANCE FOR CONTRACTORS

A. Regulatory Status

1. PCB and non-PCB containing ballasts are regulated by Connecticut as CT Regulated Waste and **MUST** be disposed of by Environmental Health and Safety (EHS).
 - All ballasts are shipped off-site for recycling.
 - All PCB ballasts are shipped off-site within 30 days of their out-of-service date.
 - A hazardous or non-hazardous waste manifest is used.
 - Manifests are to be signed by a member of the Environmental Affairs Section (EAS) of Environmental Health and Safety (EHS) at Yale University (203-432-6545).

B. Ballast Container Management

1. Segregate PCB ballasts from non-PCB ballasts.
2. Place intact non-leaking PCB ballasts into pre-labeled/pre-marked DOT approved 30 gallon or 55 gallon steel drums, which are to be provided by EAS.

Note: PCB ballasts should be placed into the drums that have the yellow “Caution Contains PCBs (Polychlorinated Biphenyls)” marking found in [40 CFR 761.45](#). Non-PCB ballasts should be placed into the drums that do not have the yellow “Caution Contains PCBs (Polychlorinated Biphenyls)” marking.

3. Keep each drum closed when waste is not being added. Use the lid, ring and bolt to accomplish.
4. Store drums containing PCB ballasts in an area labeled with the PCB marking found in [40 CFR 761.45](#), which is to be provided by EAS.
5. Store PCB and non-PCB ballast drums in a secure, dry area away from public access.
6. Fill each PCB and non-PCB ballast drum to 3/4 full.
7. Fax to 203-432-6148 or email to waste.requests@yale.edu a “Construction Waste Supply/Removal Request Form” to EHS for delivery and removal of containers.

C. Other Important Notes

1. Daily inspections of the work areas should be done by the site manager/supervisor to assure no drums are left uncovered or any ballasts are left lying on the ground.
2. Any **PCB ballasts** that have broken apart and/or are leaking a chemical substance should be wrapped in plastic and placed into their own leak-proof container. Label each container of broken and/or leaking **PCB ballasts** with the words “Non-RCRA Regulated Waste” and “Leaking PCB Lamp Ballasts”, store the containers as described above, and notify the RCRA Compliance Officer at 203-432-9384 immediately.
3. Any **non-PCB ballasts** that have broken apart and/or are leaking a chemical substance should be wrapped in plastic and placed into their own leak-proof container. Label each container of broken and/or leaking **non-PCB ballasts** with the words “Non-RCRA Regulated Waste” and “Leaking Non-PCB Lamp Ballasts”, store the containers as described above, and notify the RCRA Compliance Officer at 203-432-9384 immediately.
4. In the event of a spill or accident involving PCB or non-PCB ballasts, the following should be notified:
 - Yale Environmental Health and Safety emergency number (203-785-3555)
 - Iain Kinsella, Environmental Affairs Manager
Yale Environmental Health and Safety
Work number: 203-436-8034
Cell phone: 203-507-9041
 - Company performing the ballast 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 ballasts should be directed to the RCRA Compliance Officer at 203-432-9384.