



PCB Small Capacitors and Bulk Product Waste

The Toxic Substances Control Act (TSCA) banned PCBs in 1979. Regulations published in the federal register under 40 CFR 761 provide disposal management methods and restricted use authorizations.

What rules govern PCB Ballasts?

PCB ballasts typically fall under the definition of *PCB bulk product waste* found in 40 CFR 761.3. Storage and disposal of PCB ballasts is regulated under §761.50(b)(2)(i) and (ii). Section 761.60(b)(2)(ii) regulates ballasts with PCBs occurring in intact and non-leaking PCB small capacitors, and §761.62 regulates ballasts containing PCBs in the potting material. Leaking PCB ballasts must be disposed of as *PCB Contaminated Electrical Equipment* in accordance with §761.60(b)(4).

Are leaking ballasts considered PCB Bulk Product Waste?

No. It is important to distinguish intact PCB ballasts from leaking ones. Once a PCB ballast leaks, it is treated as *PCB Contaminated Electrical Equipment*, and the container it is in is treated as a *PCB Article Container* or *PCB Container*. Much more stringent regulations apply to leaking PCB ballasts, such as requirements for listing waste shipments on a hazardous manifest, placarding requirements for shipments, and restricted disposal methods (either TSCA landfill or TSCA waste incinerator).

Can PCB Ballasts be disposed of in a municipal landfill?

Non-leaking PCB ballasts containing small PCB capacitors and having PCB concentrations of <50ppm PCBs in the potting material may be disposed of in a municipal landfill. Some PCB ballasts, however, contain high PCB concentrations (>50ppm) in the potting material surrounding the capacitor, and cannot be sent to a municipal landfill unless they meet the PCB leachate requirement of 10µg/mL or less. If a generator decides to send PCB ballasts to a municipal landfill, they must send a notice that they are sending PCB containing materials to the landfill 15 days prior to shipment as per 40 CFR 761.62(b)(4)(i). Most landfills refuse TSCA regulated materials, bulk product waste or not, due to the CERCLA liability issue.

Why do companies recycle PCB ballasts?

Recycling of PCB and non-PCB ballasts is a preferred disposal option because it makes good business and economic sense from a liability standpoint. The CERCLA (Superfund) liability associated with disposing of PCB ballasts in a municipal or industrial waste landfill is very high. Remediation of PCB contaminated soil, water, and waste is very costly, and any company sending PCB containing materials to a landfill is a potentially responsible party (PRP) that may have to foot the bill for cleanup if the landfill becomes a Superfund site. Recycling PCB ballasts effectively eliminates generator liability because the pesky PCBs are destroyed in the process. The ballasts are cryogenically processed, and the small PCB capacitor and potting material (which, by the way, can be as much as 100% PCB!) are separated from the iron core and plastic parts of the ballast. The PCB small capacitor and potting material are then incinerated, and the iron and plastic components are recycled.