***- South Dakota Rural Electric Association -***

**2024 PCB Management, Liability & Record-keeping Workshop**

***-- AGENDA –***

**July 23:**

**8:30 – 9:30 PCB Management - Foundational Issues**

**- Brief history of the PCB regulations**

**- Why did the EPA “ban” PCBs?**

**- After 30 years of managing PCBs, where do we stand?**

**- Is EPA considering removing “Use Authorizations” from the regs.?**

**9:30 – 9:45 Break**

**9:45 – 10:45 PCB Management - Foundational Issues (continued)**

**- How the regulations are structured: Use vs. Disposal**

**- Understanding the language of the regulations: 761.3 Definitions**

**- PCB marking/labeling requirements**

**- Testing for PCBs: compliance vs. risk management**

**10:45 – 11:00 Break**

**11:00 – Noon Discovery of New PCB Point Sources - “Non-Liquid” PCBs**

**- PCBs in electromechanical relays, wave traps, potential devices, etc.**

**- PCBs in bushings, pot-heads, PTs/CTs, ballasts, etc.**

**- PCBs in paints, calks, coatings, cable, etc.**

**Noon Lunch**

**1:00 – 2:00 PCB Management Issues and Enforcement Trends**

**- “Storage for Reuse” vs. “Storage for Disposal” enforcement**

**- EPA enforcement trends and new regulatory interpretations**

**2:00 – 2:15 Break**

**2:15 – 3:15 Conflicting Interpretations and Clarifications**

**- The PCB “assumption rules” – how they are being interpreted**

**- “Storage for Reuse” limitations and record-keeping requirements**

**3:15 – 3:30 Break**

**3:30 – 4:30 EPA Update – “Advanced Notice of Proposed Rulemaking”**

**- Recent changes at EPA Headquarters on management of PCB regs.**

**- Will these changes effect electric utilities? Yes!**

**- Are new PCB regulations being proposed? Yes!**

**4:30 Adjourn**

**July 24:**

**8:30 – 9:30 PCB Spills – Reporting, Cleanup, Testing and Record-keeping**

**- PCB Spill Cleanup using the EPA’s “National Spill Cleanup Policy”**

**- PCB Spill Cleanup using the EPA’s new “Remediation Waste” rules**

**- Double Encapsulation options under 761.30(p)**

**9:30 – 9:45 Break**

**9:45 – 10:45 Compiling Compliant and Interpretable PCB Records**

**- PCB Testing Logs and Reports**

**- Drum and Bulk Storage Tank Logs**

**- PCB Disposal Shipments (Preparing shipping lists and the NEW UHWM)**

**10:45 – 11:00 Break**

**11:00 – Noon Compiling Compliant and Interpretable PCB Records (continued)**

**- Maintaining PCB Inspection records**

**- New “Retrofill/Reclassification” record-keeping requirements**

**- Compiling proper “PCB Annual Document Logs and Summaries**