Polychlorinated biphenyls (PCBs) are a group of very stable chlorinated aromatic hydrocarbons. Prior to 1980, PCBs were widely used in electrical equipment such as transformers, generators and capacitors. Due to the persistence in the environment of PCBs and the serious health concerns associated with these chemicals, the importation and manufacture of PCBs in Australia has been banned since the 1970s. As a general rule transformers up until the late 1980s contain PCBs.

The EPA Victoria prescribe that the following must be conducted:

Equipment surveys to identify likely locations, quantities and concentrations of PCBs on the electricity network must be carried out by appropriately qualified staff. Where analysis of PCB containing material is required, this must be carried out by NATA accredited laboratories.

**Transport, treatment and disposal of PCBs**

Transport of waste PCBs must be in accordance with the Environment Protection (Industrial Waste Resource) Regulations 2009, which regard PCBs as prescribed industrial waste (PIW).

Requirements under these Regulations include:
- the use of waste transport certificates
- transport by vehicles with a current permit to transport the stated category and concentration of PCBs
- treatment or disposal at facilities licensed by EPA to accept waste containing the given concentration of PCB.

If you are intending to have PCBs stored, treated, reprocessed or disposed of, your company Environmental Improvement Plan should specify the facility that you intend to use for this purpose.

Disposal of PCB contaminated soil must only occur where the concentration of the solid is within the limits prescribed in the landfill licence. Landfills are only licensed to accept solid waste with a PCB concentration of 50 mg/kg or less. Solid waste with a PCB concentration greater than this will require treatment at a licensed facility. Disposal of liquid PCBs to landfill is prohibited.

**Contaminated Soil MUST be tested.**

**Record Keeping**

Records must be kept by the distribution companies involved in the management of PCBs, so the PCBs can be tracked from the point of installation, through any handling, including transport, storage, or treatment to final destruction or disposal.

Records must include the following:
- Probable or known PCB locations, concentrations and quantities, the transporter(s) and the eventual disposal route(s). Waste transport certificates with this information may be considered an adequate record.
- Certificates of destruction or disposal linking the results of equipment surveys with the phase-out and removal of PCBs from the network.

All premises must have adequate record keeping systems to be able to:
- confirm the estimated concentrations of each load of PCBs consigned for removal from the network
- account for and notify EPA of notifiable quantities of PCBs
- update EPA annually on any changes.
What does this mean for you?

1. Prior to any work on transformers that are leaking in a fault condition or programmed works workers should:
   a. Formal training in PCB management.
   b. Inducted in the PCB management procedure and associated documentation.
   c. List PCB as a Hazard and controls on the SWMS.
   d. Verify the age of the transformer and document on the JSA.
   e. Verify that there is no PCB present through testing or verification of testing records for the ID tag and list on SWMS.
   f. If the transformer is deemed to contain PCBs, contact your manager for further direction on:
      i. Containment of leaking fluid
      ii. What PPE to wear
      iii. How to dispose of PPE
      iv. How to transport leaking transformer (i.e vehicle, permits, forms)
      v. Where to store the leaking transformer at the depot.

2. Prior to removing the transformer from site that contains PCB
   a. Determine the approximate amount of liquid from transformer specifications and drawings.
   b. Have supervision fill in the appropriate documentation for PCB transportation
   c. Verify the correct vehicle to transport hazardous substance.
   d. Implements appropriate controls for transportation back to depot.
   e. Ensure spill tray can contain the contents of the transformer.

3. When you get back to the depot:
   a. Store transformer in bunded area with triple interceptor.
   b. Dispose of PPE in line with EPA guidelines.

The negative health effects of PCBs include Cancer, Immune System Suppression, Heart Disease

It is the recommendation of the ETU that if any of the above training, hazard controls and EPA requirements are not implemented, work should cease. Contact your designated Health & Safety Representative, your local organiser or alternatively you Union OH&S Officer.