



**Department of Energy & Environmental Protection**  
**Remediation Division**  
**Roundtable**  
**Q&A Newsletter**  
**Vol. 15 ~ August 7, 2014**

Presented below are the Department's responses to verbal comments presented at the Remediation Roundtable held on May 13, 2014 as well as selected written comments received by the Remediation Roundtable Committee. The comments and responses may have been edited for clarification purposes.

**SELECTED VERBAL COMMENTS FROM THE MAY 13, 2014 ROUNDTABLE:**

**Connecticut PCB Requirements**

**Comment:** When you are doing a remediation project just for PCB contaminants can the Remedial Action Plan be used for submittal to EPA or do they require a separate document?

**Response:** *Yes the Remedial Action Plan should be submitted to both the EPA and the State. EPA does not require a separate document.*

**Comment:** When a piece of equipment is labeled as "no PCBs" can one assume it truly has no PCBs or is it just less than 1ppm.

**Response:** *The "no PCB" marking intended for light ballasts and small capacitors only is true to the label. However when looking at transformers there are 3 labeling categories, those containing PCBs under 50ppm are categorized as "non-PCB," transformers containing 50-500ppm are categorized as "PCB-contaminated and the third category of "PCB transformer" is for those containing over 500 ppm, including those filled with pure PCBs. Those that do contain pure PCBs will typically have one of the trade names for PCBs on their nameplate. The PCB regulations under TSCA require that if the PCB content of a transformer is unknown, it must be assumed to be and should be treated as a "PCB-contaminated" transformer unless and until analysis shows otherwise. It is very important to be aware of when it comes to clean-ups in Connecticut that per the RSRs RES DEC is 1ppm. So a "non-PCB" transformer could potentially have a release that results in a need for remediation.*

## **General Question and Answer**

**Comment:** Will there be additional Discussion Documents released by the Department?

**Response:** *Additional discussion documents such as Early Exits, Deed Notices and Urban Soils are being considered by the Department but have not been completed to date.*