

May 24, 2000

Ron Stewart, Service Supervisor  
Oregon City School District  
P.O. Box 591  
Oregon City, OR 97045

Dear Mr. Stewart:

This is in response to your letter of May 3, 2000, requesting clarifications on the training requirements for employees working with fluorescent light fixtures that contain polychlorinated biphenyls (PCBs).

In your letter, you asked what kind of training would be necessary for employees who handle and/or clean-up PCB-containing oils from the ballasts. In speaking with the Environmental Protection Agency (EPA), they explained that all PCB-related clean-up operations are managed through the Toxic Substances Control Act (TSCA), and they do not recognize these types of spills as uncontrolled hazardous waste sites.

Therefore, all employees who remove ballasts that contain PCB oils, perform clean-up operations from leaking ballasts, or any associated tasks need to be trained in the requirements of OAR 437-002-1910.1200, "Hazard Communications," and OAR 437-002-1910.132, "Personal Protective Equipment."

In your fifth question, you asked what kind of training is required for employees who transport ballasts that contain PCB oils. Oregon OSHA would require the above-mentioned training, but we also suggest you contact the Oregon Department of Transportation to see if they have any other training requirements for these drivers.

If you have any questions or if we can be of further assistance, please contact David McLaughlin in our Technical Section at (503) 947-7457.

Sincerely,

Marilyn K. Schuster, Manager  
Standards and Technical Resources Section  
Oregon Occupational Safety and Health Division

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