

- PCB UPDATE -

2025 RCS PCB Management Classes

It's time for employee education and training! Especially if your utility has new personnel who have been assigned PCB management responsibilities. RCS training classes provide the instruction needed (and demonstration of due diligence by senior management) to effectively handle PCB-related tasks including Program Coordination; response to and/or cleanup of spills; PCB record-keeping (e.g., compiling the EPA PCB Annual Report) and proper disposition of PCB and Non-PCB equipment.

For PCB management 'veterans', our agenda this year will include updates on the EPA's **new regulations** on cleanup of 'legacy' spills, response to spills during emergency situations, and new EPA notification requirements.

Attached is your packet for the 2025 RCS Training Classes. Included is hotel information, HOST contacts, the class agenda and registration form. Locations this year will include:

APRIL 8-9 / DUDLEY, NC / *Hosted by: Transformer Maintenance Services (*See below)

MAY 28-29 / OMAHA, NE / *Hosted by: Omaha Public Power District (*Contact RCS for Info)

JUNE 3-4 / DENVER, CO / Staybridge Suites Denver North Thornton (\$169) 303.255.6180

JULY 16-17 / LEXINGTON, KY / Holiday Inn Express & Suites Keeneland (\$123) 859.231.0656

AUG 6-7 / MINNEAPOLIS, MN / Hilton Garden Inn Maple Grove (\$159) 763.509.9500

AUG 20-21 / FRANKLIN, TN / Springhill Suites Cool Springs (\$175) 615.778.4688

SEPT - DATES TBD / COLUMBUS, OH / *Hosted by TCI of Ohio & TCI of Alabama (*See below)

NOV 11-13 / *RCS ANNUAL CONFERENCE / SPRINGFIELD, MO (*Contact RCS for Information)

****HOST Contacts for Logistics and Additional Information***

Transformer Maintenance Services - Glenn Edwards - gedwards@transmaint.com

TCI of Ohio / TCI of Alabama - Ron Shaw - rshaw@tcialabama.com

RCS INC - Marilyn O'Banion - 417.886.4580 - rcsinc@aol.com

EPA Regional Offices and State Environmental Departments are Increasing Spill Cleanup Compliance Scrutiny

A heads-up. The EPA Regional Offices, as well as many State Environmental Agencies and Departments, are increasing their scrutiny of cleanup and remediation of not only PCB but also Non-PCB spills. This past year, I have been contacted by several RCS client utilities that have been contacted/visited by their EPA Regional Office and/or State Environmental Department. In some instances, these visits were led by an independent contractor hired by the Agency to conduct inspections for the EPA.

RCS In-House Line Crew Spill Response Classes

In addition to our regional workshops, RCS also offers in-house classes specifically designed for utility linemen and spill response/cleanup contractors. Unlike the RCS full 2-day class, this course is specifically focused on the importance of proper response, containment and remediation of all oil spills (PCB and Non-PCB).

State Environmental Departments are becoming increasingly stringent in the remediation of Non-PCB (less than 50 ppm) 'oil spills'. In many cases, reporting and cleanup requirements are now being driven by more stringent 'Waters of the State' standards which can be difficult to interpret and burdensome to achieve.

Several RCS utilities are addressing this increased scrutiny in-part via in-house training to fortify awareness and liability reduction. In many cases, the utility is also utilizing this training in conjunction with their annual SPCC training requirements.

Our agenda for this 2-6 hour class typically includes the following *topics:

- **Importance of Consistent First Response to Spills**
- **Prioritizing "Contain & Communicate" Practices**
- **Encountering Leaking Equipment in the Field and in Substations**
 - **Collection & Dissemination of Spill Details**
 - **Photographing the Site**
 - **Transporting Damaged/Leaking Units**
- **New EPA Regulations on Reporting and Cleanup of 'Old/Legacy' Spills**
 - **Conducting Site Analysis Before Construction Activities**
- **State Regulations on Reporting and Cleanup of Non-PCB Spills**

[Note: *The class agenda can be customized to meet specific management goals.]

Attached is a "***RCS Client Update & Services Request***" form. If you would like more information on holding an in-house class (e.g., cost, minimum attendance, etc.), please submit the form to rcsinc@aol.com and we will contact you with additional information.

RCS Now Supports our Clients with Additional Services

RCS's educational, diagnostic and corrective action services have expanded. In addition to our PCB training classes, telephone support, records assistance and in-house PCB management evaluations, we also provide the following list of supplemental services:

RCRA Hazardous Waste Consultations & Compliance Assessments
Universal Waste Consultations & Compliance Assessments
SPCC Plan Assessments & Preparation
Used Oil Consultations & Compliance Assessments

Many of you have met RCS primary consultants, Steve & Deb Cooper. Steve has more than 35 years of regulatory experience, having managed compliance programs for the Tennessee Valley Authority (TVA) prior to joining RCS. Steve's vast knowledge of numerous Federal and State environmental rules and regulations, combined with his hands-on experience, provides RCS clients with a unique and valuable resource. If you would like more detailed information regarding the above services, we will be glad to have Steve contact you to visit and help you determine if his assistance would be helpful.

“PCBManager.com” Software Promotion

If you haven't yet done so, check-out ***“PCBManager.com”***, our web-based PCB record-keeping software. This one-of-a-kind program collects PCB testing data, drum/container records, shipping and disposal documents, and, most importantly, has been programmed to automatically compile your ***“PCB Annual Document Log & Summary”***.

As a special promotion for active RCS clients, ***“PCBManager.com”*** is now available for purchase with two months free on your first annual subscription (a \$180 discount). Simply complete and forward us the attached ***“RCS Client Update & Services Request”*** form and we will be glad to set-up a demo-account so you can “kick the tires” (no purchase required).

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In closing, we at RCS sincerely appreciate the ongoing relationship we have fostered with so many rural, municipal and Investor-Owned utilities during the past 39 years. But, even more than that, we look back most fondly at the personal relationships we have built with so many of you during that time. We hope you'll be able to join us at one of the classes this year and we wish all our best to you and yours.

Take care!

*Mark*

(417) 849-8481 [rcsinc@aol.com](mailto:rcsinc@aol.com)

*Marilyn*

(417) 886-4580 [m.obanion@aol.com](mailto:m.obanion@aol.com)

*Steve & Deb*

(423) 718-1199 [stevec999@hotmail.com](mailto:stevec999@hotmail.com)

## ***2025 PCB Management, Spills Response & Record-keeping Training***

### **-- AGENDA --**

#### **DAY 1:**

- |                      |                                                                                                                                                             |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>9:00 – 9:15</b>   | <b>Welcome and Opening Comments</b>                                                                                                                         |
| <b>9:15 – 10:30</b>  | <b>Session #1 - Introduction to the EPA's PCB Rules and Regulations</b><br><i>[45 Years and Counting – Where We're Headed from Here]</i>                    |
| <b>10:30 – 10:45</b> | <b>Break</b>                                                                                                                                                |
| <b>10:45 – Noon</b>  | <b>Session #2 - Foundational Training for New PCB Program Coordinators</b><br><i>[Emphasis on Helping Those New to EPA Rules &amp; Regulations]</i>         |
| <b>Noon – 1:00</b>   | <b>Lunch</b>                                                                                                                                                |
| <b>1:00 – 2:15</b>   | <b>Session #3 - Transformer Change-outs, Transportation &amp; Drop-off</b><br><i>[Important SOPs for Crews, Spare Equipment Management &amp; Warehouse]</i> |
| <b>2:15 – 2:30</b>   | <b>Break</b>                                                                                                                                                |
| <b>2:30 – 3:30</b>   | <b>Session #4 - PCB Storage Options &amp; EPA Notification Requirements</b><br><i>[Common Mistakes Storing Equipment for "Reuse" vs. "Disposal"]</i>        |
| <b>3:30</b>          | <b>Adjourn</b>                                                                                                                                              |

#### **DAY 2:**

- |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>9:00 – 10:30</b>  | <b>Session #5 - PCB &amp; Non-PCB Spills / EPA vs State Requirements</b><br><i>[Response, Containment &amp; Cleanup of All Oil Spills]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>10:30 – 10:45</b> | <b>Break</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>10:45 – Noon</b>  | <b>Session #5 - Cleanup &amp; Reporting "Fresh" vs. "Non-Fresh" PCB Spills</b><br><i>[EPA's "PCB Spill Cleanup Policy" vs. "PCB Remediation Waste"]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Noon – 1:00</b>   | <b>Lunch</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>1:00 – 2:15</b>   | <b>Session #6 - New Regulations on 'Old' Spills &amp; Emergency Response</b><br><i>[New EPA Rules and Notification Requirements]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2:15 – 2:30</b>   | <b>Break</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>2:30 – 3:30</b>   | <b>Session #7 - No Utility is "Out-of" the PCB Business</b><br><i>[High-level PCBs Still Lurking Within Your System including Tar-filled]</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b><u>3:30</u></b>   | <b><u>General Adjournment</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>3:45 – 4:30</b>   | <b>Session #8 - Supplemental Session for PCB Record-keepers:</b><br><br><i>You've been assigned PCB record-keeping but don't know where to begin.<br/>You've inherited PCB records from a predecessor but never received training.<br/>You're uncertain if PCB records/reports were properly compiled.<br/>You have concerns if the utility's PCB records would pass an EPA inspection.<br/>Has the utility maintained proper drum logs, lab reports, inspections, etc.?<br/>Have required PCB disposal records been kept (i.e., UHWMs, lists, CDs, etc.)?<br/>Are compliant "PCB ANNUAL DOCUMENT LOGS &amp; SUMMARIES" on file?</i> |

# *2025 PCB Management Training*

## **--- REGISTRATION FORM ---**

|                           |                                             |
|---------------------------|---------------------------------------------|
| _____<br>Company Name     | _____<br>Attendee #1 (Name & Email Address) |
| _____<br>Mailing Address  | _____<br>Attendee #2 (Name & Email Address) |
| _____<br>City, State, Zip | _____<br>Attendee #3 (Name & Email Address) |
| _____<br>Telephone        | _____<br>Attendee #4 (Name & Email Address) |

## **WORKSHOP LOCATIONS**

- \_\_\_\_ MAY 28-29/ OMAHA, NE/ Omaha Public Power District /\*1919 Aksarben Drive  
[\*Contact RCS/Marilyn - [m.obanion@aol.com](mailto:m.obanion@aol.com) - for nearby hotel options]
- \_\_\_\_ JUNE 3-4 / DENVER, CO / Staybridge Suites Denver North (\$169) 303.255.6180
- \_\_\_\_ JULY 16-17/LEXINGTON, KY/Holiday Inn Exprs. Keeneland (\$123) 859.231.0656
- \_\_\_\_ AUG 6-7 / MINNEAPOLIS, MN / Hilton Garden Maple Grove (\$159) 763.509.9500
- \_\_\_\_ AUG 20-21 / FRANKLIN, TN/ SpringHill Suites Cool Springs (\$175) 615.778.4688

[Note: When making hotel reservations be sure to mention that you are with the "RCS GROUP"]

## **REGISTRATION FEE:**

*(Includes PCB Management Reference Manual, Handouts & RCS Luncheons)*

\_\_\_\_ \$945 per person (RCS clients) \_\_\_\_ \$1,095 per person (Non-client)

## **FORM OF PAYMENT:**

\_\_\_\_ Check Enclosed or Please Bill: P.O.# \_\_\_\_\_ Verbal per: \_\_\_\_\_

\_\_\_\_ Visa \_\_\_\_ MasterCard \_\_\_\_ AmEx Card # \_\_\_\_\_

Expiration Date: \_\_\_\_\_ Cardholder Name: \_\_\_\_\_

*Submit your Registration Form via Email or Standard Mail to:*

[\*\*rcsinc@aol.com\*\*](mailto:rcsinc@aol.com)

**RCS, Inc. - 4319 S. National Avenue - Springfield, MO 65810  
417- 886-4580 (Contact: Marilyn O'Banion / [m.obanion@aol.com](mailto:m.obanion@aol.com))**

## **- Utility/Company Information -**

*[RCS Clients: Please update your information so that we can better serve you]*

Utility/Company Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

PCB Program Coordinator: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_

PCB Record-keeper: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_

## **- RCS Services & Software Information Request -**

\_\_\_\_\_ Please forward me information on becoming an RCS client

\_\_\_\_\_ Please forward me a proposal with time and cost estimate  
for an **in-house RCS “PCB Management Evaluation”**

\_\_\_\_\_ Please contact me to discuss in-house **“PCB/Non-PCB Oil  
Spills Response Class”** for line crews and designated personnel

\_\_\_\_\_ Please contact me to discuss **“PCBManager.com”** software

\_\_\_\_\_ Please contact me to discuss:

\_\_\_\_\_ RCRA Hazardous Waste Management Assistance

\_\_\_\_\_ Universal Waste Management Assistance

\_\_\_\_\_ SPCC Plan Assistance

\_\_\_\_\_ Used Oil Management Assistance

### **E-mail or Fax this information to:**

**(Fax cover sheet not required)**

**Regulatory Compliance Services, Inc.**

**4319 S. National Ave., #133**

**Springfield, MO 65810**

E-Mail: rcsinc@aol.com Fax: (417) 887.4052 Telephone: (417) 886.4580