



State of Vermont  
Department of Environmental Conservation  
Waste Management and Prevention Division  
1 National Life Drive-Davis 3  
Montpelier, VT 05620-3521  
(802) 828-1138

AGENCY OF NATURAL RESOURCES

February 16, 2026

**RE: Revisions to the Vermont Hazardous Waste Management Regulations**

Dear Town Administrator/Manager,

The Vermont Agency of Natural Resources (Agency) has recently submitted a draft of proposed revisions to the Vermont Hazardous Waste Management Regulations (VHWMR) to the Secretary of State. The VHWMR that are currently in effect were last revised in February 2022. The current revisions address the management of spill clean-up debris by allowing containerized waste to be moved to indoor storage facilities for temporary storage while the waste is characterized, and the management of polychlorinated biphenyls (PCB) bulk product waste that is generated as part of the PCBs in Schools project. A detailed summary of the proposed revisions is enclosed with this letter.

As part of the State's rulemaking effort, the proposed revisions are subject to public comment prior to becoming final. We invite all interested parties to review these revisions and submit comments to the Agency; the deadline to submit written comments is March 31, 2026. The Agency has also scheduled a public hearing on the proposed Rules on March 17, 2026, at 4:00 p.m., at the Davis Building- 2<sup>nd</sup> Floor, 1 National Life Drive, Montpelier, VT. An option to attend this meeting remotely is also available.

Since one of the proposed revisions affects the management of waste at the Coventry landfill, we thought the residents of your municipality may be interested in the proposed changes. We are providing information on how to participate in the public comment period to town officials serving in areas adjacent to the Coventry landfill. We would appreciate your assistance with getting the enclosed information to your residents; if you have a public bulletin board or another way to share information that could be of interest to your residents, please consider posting the enclosed materials for public visibility. Thank you in advance for your effort.

The complete text of the draft rules, as well as information on public participation, can be accessed on the Agency's website: <https://dec.vermont.gov/waste-management/hazardous-waste>. Information can also be accessed on the Secretary of State Rules Portal: <https://secure.vermont.gov/SOS/rules/index.php>.

If you have any questions concerning this letter, please contact me by telephone at: (802)-477-2981, or by e-mail at: [anna.bourakovsky@vermont.gov](mailto:anna.bourakovsky@vermont.gov).

Sincerely,

Anna Bourakovsky  
Hazardous Materials Program Manager

## ***Revisions to the Vermont Hazardous Waste Management Regulations***

### ***Public Participation Information***

The Hazardous Materials Program has prepared proposed revisions to the Vermont Hazardous Waste Management Regulations (VHWMR). The proposed revisions were submitted to the Vermont Secretary of State's office on February 6, 2026. Public comment on the revised regulations is now open, and written comments will be accepted through **March 31, 2026**. Submit all written comments to Anna Bourakovsky by email to [anna.bourakovsky@vermont.gov](mailto:anna.bourakovsky@vermont.gov) (electronic submission of comments preferred) or mail using the contact information below.

Anna Bourakovsky

Vermont Agency of Natural Resources, Department of Environmental Conservation

Waste Management & Prevention Division, Hazardous Materials Program

1 National Life Dr, Davis 3, Montpelier, VT 05620-3521

A **public hearing** on the revised Rules has been scheduled for March 17, 2026, at 4:00 p.m., at the Davis Building 2<sup>nd</sup> Floor (Catamount Conference Room), 1 National Life Drive, Montpelier, Vermont. A virtual attendance option will be available through Microsoft Teams, using the following link:

<https://teams.microsoft.com/meet/21455607750170?p=JAF5vyPoDMY7QI7YWu>

Please contact Anna Bourakovsky at [anna.bourakovsky@vermont.gov](mailto:anna.bourakovsky@vermont.gov) or (802) 477-2981 if you need reasonable accommodations to attend. All interested members of the public are invited to attend.

Please visit the Program website to view the text of the proposed revision (available in annotated and clean formats) and learn more about the proposed changes:

<https://dec.vermont.gov/waste-management/hazardous-waste>

Summary of Proposed Revisions to the  
Vermont Hazardous Waste Management Regulations (VHWMR)

February 6, 2026

**Revision 1- Management of Spill Clean-up Debris:** The issue that the revision is working to address is the prevalence of clean-up debris from hazardous material releases left at the site of the release (i.e., side of the road) for extended periods of time as the waste awaits analysis and approval from designated facilities (this can take up to 3 months). The Hazardous Materials Program is proposing changes to the VHWMR that would allow hazardous waste generated from spill clean-up activities to be transported to an indoor storage location for temporary (up to 90 days) storage while the waste is characterized and waste profiles are generated. The proposed changes would only apply to Vermont-listed wastes such as oily solids, diesel, and antifreeze; management of federally-listed waste is not addressed by these proposed revisions. Proposed revisions can be reviewed in sections §§ 7-404, 7-502(j), and 7-702(c) of the VHWMR.

**Revision 2- Management of PCB product bulk waste:** The issue this revision is addressing is the disposal of polychlorinated biphenyl (PCB)-containing waste from the PCBs in Schools project. Current VHWMR require all PCB-containing waste (> 50 parts per million PCBs) to be shipped on a hazardous waste manifest to an out-of-state facility; the current rules are broader in scope than federal rules regarding the disposal of PCB-containing wastes. The proposed revision aligns state rules with federal rules and guidelines for the management and disposal of PCB bulk product waste by proposing a new conditional exemption for this type of waste. The proposed revision will provide safe, efficient, and straightforward PCB disposal options and will reduce costs associated with transportation and disposal. Proposed revisions can be reviewed in section § 7-203(dd).



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## PCB Bulk Product Waste Disposal in Vermont

### What are PCBs?

Polychlorinated biphenyls (PCBs) are a group of human-made chemicals that were commonly incorporated into building materials and electrical equipment prior to the 1980s. The U.S. Environmental Protection Agency (EPA) banned the manufacturing and use of certain PCBs in 1979.

### What is PCB Bulk Product Waste?

PCB bulk product waste is defined by EPA as waste derived from manufactured products containing PCBs in a non-liquid state, where the concentration at the time of designation for disposal was  $\geq 50$  parts per million (ppm) PCBs. The definition of PCB bulk product waste includes "non-liquid bulk wastes or debris from the demolition of buildings and other man-made structures manufactured, coated, or serviced with PCBs." Other PCB bulk product wastes may include, but are not limited to, mastics, sealants, or adhesives.

### What is the Federal Guidance on PCB Bulk Product Waste Disposal?

EPA allows building material coated or serviced with PCB bulk product waste (e.g., caulk, paint, mastics, sealants) at the time of disposal to be managed as a PCB bulk product waste, even if the PCBs have migrated from the overlying bulk product waste into the substrate. This includes allowing this type of waste to be disposed of at permitted municipal landfills, such as the Casella-owned landfill in Coventry, Vermont.

### Why is Vermont Considering Changing the Rules Concerning Disposal of PCB Bulk Product Waste?

State rules for managing PCB bulk product waste are more stringent than what is established in federal rules. The current regulations do not allow for the disposal of waste that contains greater than 50 ppm PCBs at municipal landfills located in Vermont. This type of waste must be managed as hazardous waste, making handling, transport, and disposal regulatorily complex and expensive. Vermont originally developed this standard to address the management of PCB-containing insulating fluids that were often found in electrical equipment such as transformers and capacitors. However, the current regulation applies to all wastes that contain PCBs at more than 50 ppm, including bulk product wastes.

Making Vermont regulations consistent with federal regulations will allow for safe, efficient, and straightforward PCB disposal options and will reduce costs associated with transportation and disposal of such wastes. This proposed regulatory change will also help facilitate the cleanup of PCBs and promote healthy school environments by creating more cost-effective options for reducing exposure to PCBs in Vermont's schools.



