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EPA - CAPACITOR INDUSTRY MEETING

3/19/76

at
EIA Headquarters
2001 Eye Street
Washington, D.C.

Attendance:

Blake A. Biles - EPA Office of Water Enforcement
Dr. Andrew W. Breidenbach - EPA Deputy Administrator
Perry W. Brunner - EPA, Office of Toxic Substances
Alan S. Carson - EPA, Hazardous Waste Management Division
N. Ray Clark - Universal Manufacturing Corporation
Lucas P. Hart, Jr. - General Electric Company
Richard L. Hauser - Electric Utilities Corporation
Raymond E. Johnson, Esq. - EIA, Staff Attorney
Thomas Kopp - EPA, Office of Toxic Substances
John P. Lehman - EPA, Hazardous Waste Management Division
Tyler Nourse - EIA, Staff Vice President
John F. Repko, Esq. - General Electric Company Attorney
Richard Rollins - JARD Co. Inc.
Donald M. Sauter - Westinghouse Electric Company
Carl J. Schafer - EPA, Office of Water Enforcement
Dr. Glenn E. Schweitzer - EPA, Office of Toxic Substances
Clifford P. Tuttle - Aerovox Industries
Dr. I.E. Wallen - EPA, Office of Toxic Substances
J. Cole Weber - Monsanto, 800 N. Lindbergh Blvd., St. Louis, Mo.

Dr. Wallen passed out copies of:

- 1) A list of EPA activities related to PCBs
- 2) A January 1976 compilation of a Review of PCB levels in the environment
- 3) One copy for the industry committee (additional copies will be available shortly) of the Versar report "PCBs in the United States: Industrial Use and Environmental Distribution"

At EPA suggestion, the Industry delegation, chaired by Clifford Tuttle, chaired the meeting, with agenda as previously agreed upon, copy attached.

Richard Rollins reviewed the industry's requirements for a dielectric fluid, as covered in his previously prepared statement, copies of which have previously been distributed to industry representatives. Cliff Tuttle made a plea for assistance and guidance by Governmental agencies in resolving the questions of fire resistance, and environmental acceptability.

Dr. Schweitzer raised the question as to whether the dielectric fluid requirements discussed apply to both power capacitors and small industrial capacitors, and the reply was affirmative. He also questioned whether it is appropriate to consider other than liquid alternatives (e.g. unimpregnated film). Industry representatives explained the differences in practice between Japan - Europe, and the USA, and the effect of voltage on corona considerations. Film is a candidate, but not for the full range of voltage and temperature.

Dr. Schweitzer pointed out that EPA has a 3-fold objective:

- 1) Phase out PCBs in the environment (long term)
- 2) Phase out PCBs in current manufacture (near term)
- 3) Minimize entry of PCBs into the environment during the phaseout period (immediate).

He asked for industry cooperation in solution of all three objectives; industry representatives responded that our understanding of the primary purpose of the joint committee is to find an acceptable solution to the second objective.

Dr. Schweitzer discussed environmental considerations from the EPA standpoint, pointing out that one must start with the original materials and processes used for synthesizing the potential alternative material (or materials), and consider by-products, decomposition products, health effects on exposure, disposal problems -- the whole bit.

Mr. Hart asked for guidance as to how the industry can proceed to determine the environmental acceptability of alternatives, and pointed out that each user may use a different additive. Dr. Schweitzer responded that each user's combination would have to be evaluated; however, unless a chemical combination occurs, as distinguished from a mixture, an evaluation may be made on the basis of the individual components. The manufacturer of the liquid or other chemical is expected to come to EPA for an opinion (Dr. Wallen is the contact) as to environmental acceptability, and EPA will respond in writing. Written responses will not be kept confidential, since there is currently no legislative authority to withhold them from the public; however, informal discussions can be held, except if an EPA opinion is desired, it cannot be verbal. Within about six months, a contractor's opinion will be available on the environmental acceptability of each of the potential alternatives popularly being considered. This will not necessarily represent EPA's judgement.

Dr. Schweitzer stated the judgement of the EPA--that there is no evidence that Aroclor 1016 is environmentally acceptable--and indicated that he had no expectation that the Administrator would modify his position to call for "a phaseout of all PCBs except 1016."

The effluent limits on PCB content which will be included in revised discharge permits will be based on EPA's judgement of best practical technology, and could conceivably be different for different plants. The target is in fact zero; however, present analytical methodology and equipment has a limit of detection of about one part per billion. Background will be deducted. Discharges into storm sewers which result from rain runoff from plants will be considered as effluent from the plant, and will be subject to permit.

Solid Waste Management: EPA's position is one of advisory and guideline activity, since at present no regulatory authority exists. They have prepared a summary of recommended procedures (which will be published at end of March in Federal Register) and are supplying to those attending, a list of disposal facilities which have the technical capability, and have indicated a willingness, to handle PCBs in a manner consistent with the recommended procedures.

Mobility of PCBs in land disposal sites: Some studies will be available in April 1976 of the results of EPA-sponsored tests at 12 different disposal sites, which may or may not be specific sites for disposal of PCB wastes. These sites are municipal sanitary landfills and the equivalent; not special Class I fills. Additional studies are being made.

The trials on incineration of ground up rejected capacitors in a rotary kiln will be performed in April; the results will be reported about three months later. Air effluent, ash, and stack gas scrubbing residue will be included.

Dr. Schweitzer indicated that EPA favors our working with CPSC, UL, Department of Commerce, etc. with regard to the possible fire hazard of potential substitutes. Under present circumstances, EPA officially considers only environmental factors. However, if a Toxic Substances Control Act is passed, then EPA will presumably have statutory authority and responsibility to consider other hazards, such as fire. EPA will urge the National Bureau of Standards, probably in the form of an interagency agreement, to set up a program to evaluate (in capacitors) the potential fire hazard involved in the use of the various candidates for PCB replacement. Dr. Schweitzer did not hold out much hope of getting any meaningful action from CPSC.

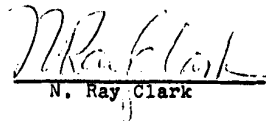
Dr. Schweitzer suggested one more meeting of this task group within about six weeks at which we would address ourselves to only those points which we believe should be brought to the attention of the Administrator at a subsequent meeting, probably in June - for example:

Arcolor 1016
Fire Hazard
Phaseout Timetable

He urged that we review the Versar report, and supply comments to provide a sharper description of the scope of that portion of the capacitor industry we are talking about.

The meeting was adjourned about 4:20 PM.

Notes Prepared by:


N. Ray Clark

NRG/h
3/22/76

Distribution:
Industry & EIA Participants
Other Members of EIA Ad Hoc Committee