CHEMICAL MANUFACTURERS ASSOCIATION

January 30, 1985

BY HAND

Ms. Denise Keehner
Acting Director
Chemical Regulations Branch
Office of Toxic Substances
Environmental Protection Agency
401 M Street, S.W.
Room 343, East Tower
Washington, D.C. 20460

Re: PCB Use in Electrical Transformers (OPTS 62035A)

Dear Ms. Keehner:

I am writing to provide information requested at the hearing on EPA's proposed regulations for PCB transformer use. During his presentation, Dr. John Craddock, Chairman of the Chemical Manufacturers Association PCB Program Panel, was asked two questions that he could not immediately answer. As promised at the hearing, this letter supplies the requested information.

Nearly all transformers used in the chemical industry are configured in a radial fashion, rather than in spot networks. Electrical experts within the industry have reported to CMA that all systems of which they are aware are radial. It is, however, possible that transformers employed in some few chemical plants are supplied by utilities as part of a spot network. Therefore, as indicated in the testimony at the hearing, transformers in the chemical industry will be individually protected and provided with disconnect devices and will thus be more likely to be removed from service than transformers in spot networks.

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CMA surveyed its members in 1981 to determine the number of PCB transformers in use in the chemical industry. Data were reported by 68 firms representing approximately one-third of U.S. chemical industry sales; the survey cautioned that projections of the data to the entire industry would be uncertain. The survey found the following breakdown of transformers among the 68 reporting firms:*/

Type of Transformer	Number Reported	PCB Poundage
Non-PCB and Contaminated	12,441	2,419
<40% PCB	1,741	5,364
>40% PCB	2,992	16,985,700

I would also like to clear up any confusion concerning the mention by Dr. Silbergeld in the Environmental Defense Fund's written comments of a transformer fire at a chemical plant in Hoogeveen, the Netherlands. During her testimony, Dr. Silbergeld indicated that in her recollection of a report from Mr. Kransberg, it "was not at all clear whether that [fire] was involving a transformer at all." (Tr. Jan. 16, 1985, at 422). CMA has contacted Mr. Kransberg, who has been actively involved in PCB issues in the Netherlands, and learned he is aware of no PCB transformer fires anywhere in Europe.

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*/ Complete survey results, as compiled by Regulatory Research Service, were submitted to EPA on December 7, 1981, in the Agency's rulemaking OPTS 62015.

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We are also enclosing a copy of the letter we recently filed with the Office of Management and Budget. It responds to OMB's solicitation of comments on the information collection request EPA filed in connection with the proposed PCB transformer rule.

Sincerely,

Robert J. Fensterheim
Manager
PCB Program

Enclosures

cc w/ encs.: TSCA Public Information Office

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