Monsanto

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DATE : October 26, 1983

cc. J. R. Condray - G3WG
P. H. Smith - G3WB

SUBJECT : PCB Transformer Regulations

REFERENCE :

TO :
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The PCB transformer regulations are still in limbo. EPA has recently announced plans to issue still another regulation dealing with "totally enclosed" electrical uses of PCBs, especially in transformers and capacitors. The tentative timetable calls for the final new transformer rule in mid-1985, however, the EPA has not yet started even outlining such a rule.

Several Monsanto plants have in the past two weeks asked for an opinion on the advisability of hiring a transformer consultant company to chemically treat their transformers to reduce PCB levels below 50 ppm - the current regulatory cut-off. Such services are offered by a number of EPA permitted and approved electrical service companies. Two Monsanto bid proposals I have seen were in the $100k-$200k range for a number of transformers all currently below 3000 ppm PCB.

With the current state of regulations and the very high cost associated with PCB removal at low levels (less than 3000 ppm) to below 50 ppm I do not recommend taking any action to chemically treat electrical units at this time to achieve the current regulatory cut-off of less than 50 ppm unless there is a problem with the unit such as leaking, electrical malfunction, etc.

The next set of PCB electrical equipment regulations might set a PCB regulatory cut-off significantly lower. (Ranges of 1 to 5 ppm or perhaps as high as 10 ppm have been proposed for the electrical equipment regulatory cut-off. Some environmentalists have asked for even more stringent requirements in addition to PCB removal to less than 5 ppm such as enclosing in concrete vaults, employing alarms and electronic monitors, etc.)

If you have specific questions, I'll be happy to discuss these. However, at this point in time I recommend careful attention to inspection, storage, and disposal regulations, especially for electrical equipment to insure compliance. EPA is currently placing a lot of emphasis on enforcement and inspection activities in this area. (Two Monsanto plant sites have received PCB compliance inspections since August, 1983.)

Please communicate this information to appropriate manufacturing staff.

J. H. Craddock

/dg

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