

✓ MAP
YA
REM

12 edit EPA

On list of attendees please
try to put position in for it

R. G. Potter - B2SB
J. C. Weber - B2SK
D. Wood - B2SD
C. Paton - B2SK

Attached is some material
from the January 14 EPA -
Industry - PCB Meeting.

WBP

MCNS 058569

Statement by Richard L. Hauser, President
Electrical Utilities Company, La Salle, Illinois
at EPA Industrial Meeting on PCB
Washington, D.C.
January 14, 1976

Mr. Train, my name is Richard Hauser. I am President of the Electrical Utilities Company in La Salle, Illinois. My company manufactures capacitors used in air conditioners, television receivers, lamp ballasts, and many other types of equipment.

As is the case with similar capacitors made by other manufacturers in the United States, they are almost all impregnated with Polychlorinated Biphenyl, known as Monsanto Aroclor #1016. In common with other aroclors, this material is non-flammable in the usually accepted sense.

In the pursuit of the goal of phasing out PCB's in the United States, I believe it is imperative that we take into consideration not only the adverse environmental effects we are trying to minimize, but also the safety impact of these actions.

One consideration which must be faced squarely is the matter of flammability. There are literally hundreds of millions of small industrial capacitors impregnated with non-flammable Polychlorinated Biphenyl (PCB) in service today. I am not concerned about their contribution to fire hazard in these existing installations. However, an additional 50 to 75 million of these capacitors are being placed in service each year.

The materials the Electrical Utilities Company has tested may be more environmentally acceptable than PCB's, and they have other characteristics which make them reasonable candidates for use in industrial capacitors, however they have flammability characteristics as dangerous as those of ordinary mineral oil. I am aware that there^{have} as yet been no serious fire problems attributable to capacitors in Japan since they switched from PCB's to other impregnants. I am aware that pressure interrupting devices in some applications or electrical fuses can be used to reduce the possibility of case ruptures or fire when a capacitor fails. These safety devices, while reasonably reliable, are by no means completely effective. There also may not yet be many non-PCB capacitors in service in Japan. Failures are more likely to occur in application when the capacitors are older. Unless some other component in equipment fails first, or capacitors are removed from service for other reasons, all small industrial capacitors will eventually fail in service.

Because of the large number of capacitors being put into service, if they contain a flammable dielectric, it is my opinion that it will not be long before the first failure occurs resulting in a fire. The Electrical Utilities Company has already had a fire in our factory while experimenting with non-PCB's.

If our industry agrees to phase out PCB's, EPA should agree to help us coordinate the introduction of non-PCB's with those organizations and agencies that will be concerned with flammable capacitor dielectrics. Underwriter's Laboratory, the Consumer Product Safety Commission, and insurance companies using the National Electric Code will be some of the organizations concerned.

Also, my company has no wish to jeopardize its own survival, as well as peoples' lives and property, by producing a product which is not as safe as capacitors are today. If we are forced to use flammable dielectrics, some type of government sponsored indemnification for potential damages could greatly aid users of non-PCB capacitors and reduce the risk to capacitor manufacturers potential damages pose. I hope that in our mutual search for reasonable alternatives to PCB's you will take these suggestions into account.

AGENDA

Introductory Remarks

Mr. Train

General Overview

Mr. Schweitzer
Director
Office of Toxic Substances

Alternative Approaches to Replacing
PCBs

Moderated by
Dr. Breidenbach
Assistant Administrator
for Water and Hazardous
Materials

Comments by Representatives of Industrial
Associations

Comments by Representatives of Companies

Current EPA Field Activities
Affecting Manufacturers

Mr. Legro
Assistant Administrator
for Enforcement

Closing Remarks

Mr. Train

Meeting will adjourn promptly at 4:30 PM

MONS 058572

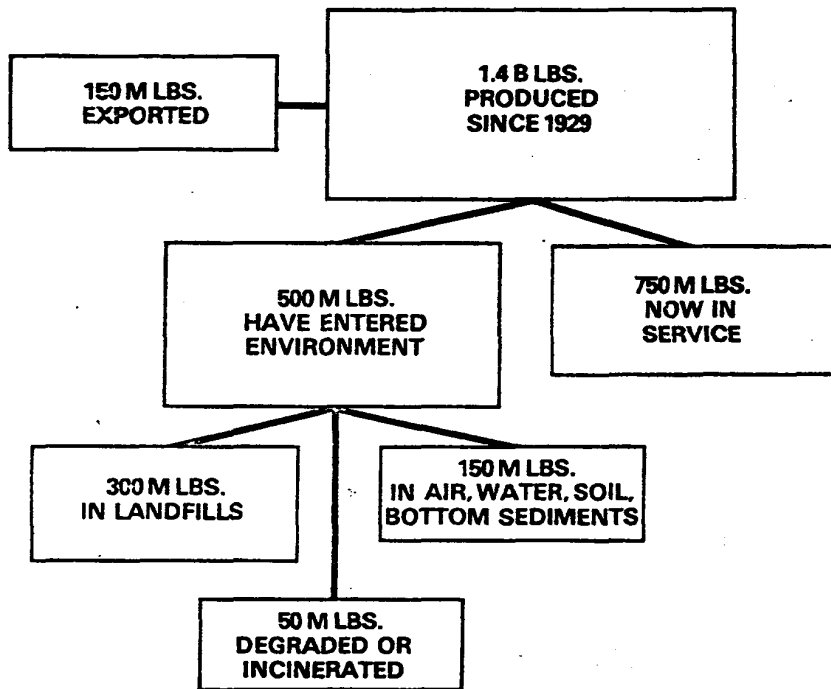
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W. B. Henderson *	Envirotech Corp.	717-272-2001

PCB HISTORY IN THE U.S.



PCBs IN THE ECONOMY

Millions of Pounds

	<u>Sold to Date</u>	<u>Currently in Use</u>	<u>Annual Additions (1974)</u>	<u>Annual Losses</u>	<u>Individual Units in Use</u>	<u>Comments</u>
Transformers	337	300	3.5%	1%	135,000	
Public Buildings					30%	200-3,000 lb/unit
Trains/Subways					50%	500-1,500 lb/unit
Industrial Applications					20%	1,000-12,000 lb/unit
Large Capacitors (>2 lb)	290	180	6%	2%	5M	
Electrical Utilities					90%	
Industrial Applications					10%	
Small Capacitors	430	270	3%	3%	790M	
Lights, TV, Air Conditioners					70%	.07-1 lb/unit
Motors, Other Industrial Uses					30%	.1-1 lb/unit
Paper Products	63					
Miscellaneous (Sealants, Paints, Inks)	40					
Investment Casting Wax	3	.7-2	5%			
Hydraulics/Lubricants	87					
Mining						
Other						

OBJECTIVES

LONG-TERM

- **ELIMINATE PCBs FROM ECONOMY**

NEAR-TERM

- **ELIMINATE PRODUCTION AND IMPORT OF PCBs AND PCB-CONTAINING PRODUCTS**

IMMEDIATE

- **INTERDICT AS MANY ENVIRONMENTAL DISCHARGES OF PCBs AS POSSIBLE**

WITHOUT UNNECESSARILY

- **DENYING PUBLIC OF ESSENTIAL PRODUCTS AND SERVICES AT REASONABLE COST**
- **DISRUPTING EXISTING BUSINESS PATTERNS**
- **JEOPARDIZING OUR INTERNATIONAL COMPETITIVE POSITION**

STRATEGY IN IMMEDIATE FUTURE

Utilize Federal Authorities Under FWPCA

Permit Program

Toxic Effluent Standards

Pretreatment Standards

Water Quality Criteria

Spill Regulations

Encourage Use of State and Local Authorities

Effluent Standards

Solid Waste Disposal Regulations

Encourage Voluntary Steps by Manufacturers, Transporters, Users, and Disposers

Reduce Losses from Federal Facilities

Accelerate Assessment Activities

Seek Toxic Substances Control Legislation

ILLUSTRATIVE PCB ROUTES TO AQUATIC ENVIRONMENT

(Transformers and Capacitors)

	<u>DIRECT TO WATER</u>	<u>INDIRECT VIA SOIL</u>	<u>INDIRECT VIA AIR</u>
NEAR MANUFACTURING SITES	Process & Coolant Effluent (2) Storm Runoff (2)	Landfill Seepage (3)	Emissions and Vaporization (2)
TRANSPORT AND STORAGE	Water Spills (1)	Land Spills (3) Equipment Leaks (2)	Emissions and Vaporization (1)
AT OPERATIONAL SITES		Liquid Overflow (1)	Venting (1)
DISPOSAL		Landfill Seepage (4) Product Abandonment (4)	Emissions and Vaporization (3)

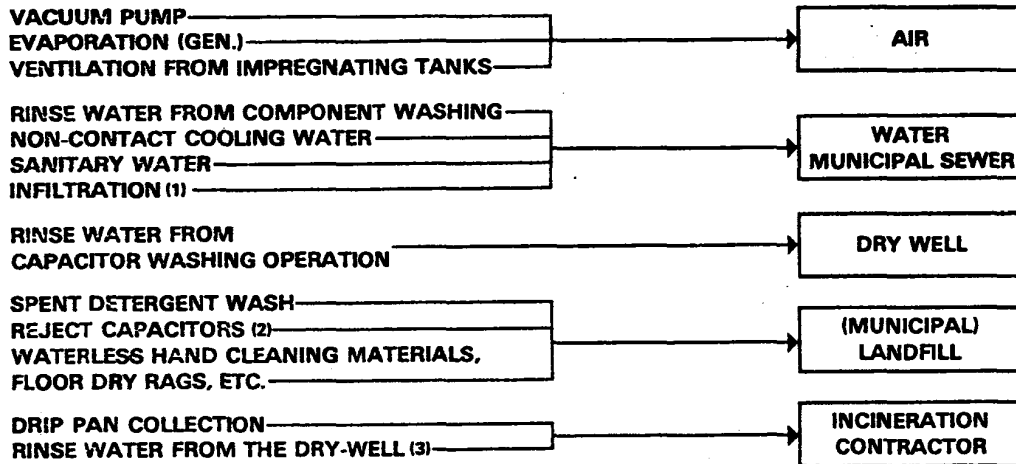
(4) >>> 10,000 lbs/yr.

(3) > 10,000 lbs/yr.

(2) 1,000 - 10,000 lbs/yr.

(1) < 1,000 lbs/yr.

PCB DISCHARGE ROUTES (Small Capacitor Plant)



NOTES: (1) INCLUDES MISCELLANEOUS SPILL IN TRANSFER OR STORAGE

(2) QUANTITY OF REJECTS IS 3-4%

(3) NO WATER HAS BEEN PUMPED & SENT TO INCINERATION TO THIS DATE

POSSIBLE ALTERNATIVES TO PCBs

TRANSFORMERS

Mineral Oil in Vault or Relocation Site ✓

Air or Gas Cooled ✓

Environmentally Acceptable Replacement Fluids ✓

LARGE CAPACITORS

Mineral Oil at Selected Sites ✓

Use of DC Motors ✓

Environmentally Acceptable Replacement Fluids ✓

SMALL CAPACITORS

Elimination of Need for Filler (e.g. plastic film) ✓

Environmentally Acceptable Replacement Fluids ✓