SUMMARY SHEET

PCB Manufacturing, Processing, Distribution in Commerce and Use Prohibition Rule

April 19, 1979

This Summary lists the major requirements of the PCB Prohibition Rule as it affects certain industries and other organizations. This is an informal document, and persons are directed to the PCB Ban Regulation for specific requirements. It should be noted that whenever exemptions are mentioned, the affected activity can continue until EPA rules on the exemption request.

Electric Utilities

- PCB capacitors and transformers and PCB-contaminated transformers can be used for the remainder of their useful life.
    - ° PCB transformers contain 500 ppm or more of PCBs.
    - ° PCB contaminated transformers contain 50 to 500 ppm PCBs.
- Utilities may service and rebuild their own PCB-contaminated transformers without restriction.
- Utilities may service, but not rebuild (remove coil), their own PCB transformers.
- Utilities can have others service PCB transformers and PCB-contaminated transformers, but if the other servicer adds non-utility owned PCBs (including PCB-contaminated mineral oil) the servicer must have an exemption from EPA after July 1, 1979.
- PCB transformers can be converted to PCB-contaminated transformers by a retrofill process, provided that the converted transformer can be operated for at least three months after the conversion so tests can be performed. During retrofill the transformer coil can not be removed.

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- Storage tanks can be used for storing and handling PCBs and PCB-contaminated fluids. SPCC plans can be used for storage area spill and accident control measures when storage tanks are used.

- PCBs from PCB transformers must be incinerated by high temperature incinerators.

- PCB-contaminated fluids from PCB-contaminated transformers must be disposed of by high efficiency boilers, in chemical waste landfills, or by high temperature incineration meeting EPA requirements.

- PCB transformer casings must be disposed of in chemical waste landfills after draining.

- PCB-contaminated transformer casings may be scrapped, salvaged, or disposed of as municipal-type solid waste.

- Testing of transformer fluids is not required. The Rule contains criteria for making reasonable assumptions about PCB concentrations.

- PCB-contaminated transformers do not have to be labelled.

- Waste oil (including transformer oils) that contains any detectable PCBs cannot be used as dust control agents, sealants, pipe coatings, or pesticide carriers.

Transformer Service Companies

- Transformer service companies can service PCB and PCB-contaminated transformers owned by others, but if PCBs or PCB-contaminated fluids are used that are not owned by the transformer owner, then the service company must have an exemption from EPA.

- Other restrictions on transformer service companies for using, handling, storing, or disposing of PCBs are identical to those outlined earlier for electric utilities.

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Transformer and Capacitor Manufacturers

- All processing of PCBs into transformers and capacitors is banned on the effective date of the rule unless an exemption is obtained from EPA.

- All distribution in commerce of PCB transformers and capacitors is banned after July 1, 1979 unless EPA grants an exemption.

- All PCB capacitors disposed of by these manufacturers must go to chemical waste landfills or high temperature incinerators.

PCB Equipment Manufacture and Distribution in Commerce

- Production of PCB equipment is considered processing of PCBs, not manufacturing of PCBs.

- All processing and distribution in commerce of PCB capacitors into PCB equipment is banned after July 1, 1979 unless EPA grants an exemption.

- All PCB capacitors disposed of by these manufacturers must go to chemical waste landfills or high temperature incinerators.

- Distribution in commerce of PCB equipment is banned after July 1, 1979 unless EPA grants an exemption.

Large Industrial Operations

- Large industrial operations will be affected by the PCB Rule if they use PCB or PCB-contaminated transformers, large PCB capacitors, PCB or PCB-contaminated hydraulic or heat transfer systems, or use or dispose of PCB-contaminated waste oil.

    - Transformers and Capacitors - Industrial and other private transformer owners are subject to the same requirements as electric utilities.

    - Hydraulic Systems (containing PCB or PCB-contaminated fluids)

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- Must be tested for PCB content by November 1, 1979 and annually thereafter.

- Systems containing PCBs can continue to be used until July 1, 1984.

- Annual draining and refilling of systems containing more than 50 ppm PCBs is required. Topping off systems to get below 50 ppm in lieu of draining is permitted.

- No hydraulic fluids containing more than 50 ppm PCBs may be added to hydraulic systems.

° Heat Transfer Systems (containing PCBs or PCB-contaminated fluids)

- Any PCB heat transfer system used in the manufacture of any food, drug, or cosmetic is banned after November 1, 1979.

- Testing and PCB reduction requirements are identical to hydraulic system requirements.

° PCB-contaminated waste oil

- Waste oils containing any detectable levels of PCBs cannot be used as a dust control agent, sealant, pipe coating, or pesticide carrier.

° PCB waste fluids

- Any PCB liquids with 500 ppm or greater PCBs must be disposed of by high temperature incineration.

- PCB liquids with 50 to 500 ppm PCBs must be disposed of by high efficiency boilers, chemical waste landfills, or high temperature incinerators.

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Pigment Manufacturers and Related Industries

- As of January 1, 1979 businesses can no longer manufacture pigments that contain or use processes that at any step in the reaction sequence contain PCBs above 50 ppm unless they have obtained an exemption from EPA.

- After July 1, 1979 persons are not permitted to process or distribute in commerce pigments that contain greater than 50 ppm PCB unless these businesses have obtained an exemption from EPA.

- Requirements for labelling pigments will be specified in the exemptions granted by EPA.

Other Chemical Manufacturers

- Persons are not permitted to manufacture chemicals that contain or use processes that at any step in the reaction process contain PCBs in excess of 50 ppm unless they have an exemption from EPA. This applies to persons who intentionally or unintentionally manufacture PCBs.

- Persons are not permitted to process or distribute in commerce chemicals that contain PCBs in excess of 50 ppm unless they have obtained an exemption from EPA.

- Requirements for labelling of chemicals will be specified in the exemption ruling by EPA.

Users of Natural Gas Compressors

- Utilities are permitted to use natural gas compressors that contain greater than 50 ppm PCB until May 1, 1980. By that date, utilities will have had to reduce their PCB concentration to less than 50 ppm.

- For disposal requirements of PCB fluids, see PCB waste fluids in Industrial Operations.

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Manufacturers, Processors, and Users of Small Quantities of PCBs for Research and Development and Microscopy

- Small quantities of PCB may be used for research and development and for use as a microscopic mounting medium.

- As of January 1, 1979, no one may manufacture small quantities of PCBs for research and development and for microscopy unless he has obtained an exemption from EPA.

- As of July 1, 1979, no one may process or distribute in commerce small quantities of PCBs unless he has obtained an exemption from EPA.

Railroad Industry

- The railroad industry may continue to use their PCB railroad transformers until July 1, 1984; however, the railroad industry must comply with the following schedule of reduction of PCBs.

  - By January 1, 1982 the PCB concentration must be reduced to 60,000 ppm.

  - By January 1, 1984 the PCB concentration must be reduced to 1,000 ppm.

- Railroad transformers must be tested immediately after the transformer has been refilled to reduce the PCB concentration. Railroad transformers must be tested again between 1 to 2 years after the last refilling.

- The railroads may service their own transformers; however, if someone else adds PCBs not owned by the railroad in order to service the transformer, the servicer must have an exemption from EPA.

- Rebuilding of railroad transformers is permitted; however, rebuilt transformers may not be refilled with dielectric fluid that contains greater than 50 ppm PCB.

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Electromagnet Users

- Persons may use and service electromagnets that contain PCBs.
- Persons may not rebuild electromagnets that contain greater than 500 ppm PCB.
- Persons may service their own electromagnets; however, if someone else adds PCBs not owned by the electromagnet owner in order to service the electromagnet, the servicer must have an exemption from EPA.

Mining Industry

- Mining companies may use and rebuild continuous miner-type equipment that contains greater than 50 ppm PCB until January 1, 1980. Loader-type mining equipment that contains greater than 50 ppm PCB must be replaced by non-PCB containing motors whenever the motor is serviced. All such motors must be replaced by January 1, 1982.
- Mining companies may service their own equipment; however, if someone else adds PCBs not owned by the equipment owner in order to service the equipment, he must have an exemption.

High Efficiency Boilers for Disposal

- Boilers with a 50 million BTU/hr or greater rating may qualify for 50-500 ppm PCB disposal.
- Boilers must operate at less than 50 ppm CO (100 ppm CO for coal boilers) and 3% excess oxygen.
- PCB contaminated mineral oil dielectric fluid can be burned with only advance notice to EPA, assuming boiler meets criteria.
- Other PCB contaminated fluids (waste oil, hydraulic fluid, heat transfer fluid) can be burned only after obtaining EPA approval.

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Import/Export of PCBs

- No PCBs (except wastes) may be imported or exported as of the effective date of the rule unless an exemption has been obtained from EPA.

- PCB wastes may be imported or exported until May 1, 1980 provided certain reporting and recordkeeping requirements are met.

- No PCB items may be imported or exported after July 1, 1979 unless an exemption has been obtained from EPA.

Economic Summary

This summary does not include disposal costs that are being incurred as a result of the February 17, 1978 PCB Disposal and Marking Rule.

- Total first year cost of the rule is expected to range from $58 million to $105 million.

- Economic cost of the prohibition on PCB waste oil use may be as high as $31.7 million per year for the first few years.

- Economic costs to electric utilities and other users of large electric articles are as follows:

  - Ban on rebuilding PCB transformers is estimated to be $12 million the first year.

  - Cost of disposal of PCB-contaminated mineral oil will range from $3.2 million to $17 million for the first year.

- Railroads and transit companies may have to spend as much as $12.2 million over the next 5 years.

- Total cost to the underground mining industry will range from $2.6 million to $4.2 million.

- The total cost to hydraulic system owners will range between $14.6 and $25 million over a two-year period.

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- Total cost to heat transfer system owners will range between $12.2 and $17.8 million over a three year period.

- Total cost to manufacturers of diarylide and phthalocyanine pigments will be about $5.6 million over a two year period.

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