Westinghouse
Electric Corporation

Transmission and Distribution

J D Campbell
Vice President
Transformer Divisions

Westinghouse Building
Gateway Center
Pittsburgh Pennsylvania 15222

November 8, 1979

The Honorable Bob Eckhardt
Chairman, Subcommittee on Oversight
and Investigations
The United States House of
Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

Westinghouse Electric Corporation is pleased to have this opportunity to cooperate in your inquiry into the potential health hazards posed by Polychlorinated Biphenyls and the Environmental Protection Agency's implementation of the ban on the manufacturing, distribution and use of PCBs.

As requested in your letter, dated October 24, 1979, we are providing the following answers to your questions in the order presented:

1. Westinghouse Electric Corporation manufactured PCB transformers using the trade name "Inerteen." Westinghouse announced on July 15, 1976, that it would end production of Inerteen-filled transformers in December 1976. Westinghouse actually shipped the last Inerteen transformers in early to mid-1977.

Westinghouse ceased the manufacturing of Inerteen transformers when rules were proposed by the U.S. EPA under Sections 307(a) and 311 of the Federal Water Pollution Control Act Amendment of 1972. In addition, the sole U.S. supplier announced its intention to cease the manufacture of PCBs and the U.S. Senate included within the bill for the Toxic Substances Control Act a provision for the elimination of PCBs.

2. Westinghouse manufactured both mineral oil-filled and Inerteen-filled transformers. Our customers specified the type of dielectric fluid required in particular applications but separate lists distinguishing the two types of transformers were not maintained.

However, Westinghouse did utilize the word "Inerteen" on the transformer nameplate and after 1970 has used an additional nameplate recommending extreme care in the handling of the transformer (Attachment 1). Moreover, Westinghouse supplied an instruction book containing recommendations for the handling and disposal of Inerteen and Inerteen transformers (Attachment 2).

Westinghouse learned in 1976 that PCBs were unintentionally present in some mineral oil transformers. After an investigation, Westinghouse notified its customers of this possibility and suggested that mineral oil-filled transformers be checked for PCB content when performing repair, routine maintenance or disposal (Attachment 3). In addition, Westinghouse issued a press release to four trade publications concerning this situation (Attachment 4). When final EPA rules published May 31, 1979, did not require testing of mineral oil-filled transformers, Westinghouse notified those customers who received transformers filled with mineral oil during the 1976 period when PCB tests of its oil-filling system indicated the possibility of the presence of PCBs in excess of 500 ppm that 40 CFR 761 should be consulted for the applicable options or actions available with respect to these transformers (Attachment 5).

3. After Westinghouse ceased the manufacture of Inerteen transformers, equipment used in their manufacture was decontaminated and tested to insure that the decontamination procedures were effective.

4. Prior to April 1978, Westinghouse utilized licensed chemical waste landfills or licensed high temperature incinerators for disposal of contaminated solids and liquids. Subsequent to April 1978, solid wastes have been shipped to EPA permitted PCB landfills. However, since the U.S. EPA has not issued a permit to a commercial high temperature incinerator, PCB liquids are being stored in accordance with the requirements of 40 CFR 761.

5. Westinghouse has long maintained an active industrial hygiene program and has utilized available information to insure that employes are protected (Attachment 6).

6. The standard transformer dielectric fluid is mineral oil. Westinghouse also manufactures some types of transformers filled with silicone or a high temperature hydrocarbon fluid when specified by the purchaser for an application where a fire resistant fluid is needed. Because neither silicone nor high temperature hydrocarbon fluids have fire resistant properties equal to Inerteen Westinghouse is continuing research on other dielectric fluids.

7. Westinghouse has facilities which service transformers in accordance with 40 CFR 761 and a petition for exemption from the PCB ban rules. Westinghouse does not rebuild, in accordance with 40 CFR 761, PCB transformers.

If you desire any further information please contact me.

Sincerely,

J. O. Campbell

NINETY-SIXTH CONGRESS

BOB ECKHARDT, TEX., CHAIRMAN

JOE SKUBITZ, KANS.
ALBERT GORE, JR., TENN.
PHILIP R. SHARP, IND.
ANTHONY TOBY MOFFETT, CONN.
ANDREW MAGUIRE, N.J.
HARLEY O. STAGGERS, W. VA.
(EX OFFICIO)

NORMAN F. LENT, N.Y.
MATTHEW J. RINALDO, N.J.
MARC L. MARKS, PA.
TOM CORCORAN, ILL.
WILLIAM E. BROOMFIELD, CALIF.
JAMES T. BROYHILL, N.C.
(EX OFFICIO)

Room 2336
RAYBURN HOUSE OFFICE BUILDING
Phone (202) 225-4441

MARK J. RAUH
CHIEF COUNSEL/STAFF DIRECTOR

CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES
SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS
OF THE
COMMITTEE ON INTERSTATE AND FOREIGN COMMERCE
WASHINGTON, D.C. 20515

October 24, 1979

Rec'd 11-7-79

Mr. Robert E. Kirby
Chairman of the Board
Westinghouse Electric Corporation
Westinghouse Building-Headquarters
Gateway Center
Pittsburgh, Pennsylvania 15222

Dear Mr. Kirby:

Pursuant to Rules X and XI of the Rules of the House of Representatives, the Subcommittee on Oversight and Investigations is conducting an inquiry into the potential health hazards posed by Polychlorinated Biphenyls (PCBs) and the Environmental Protection Agency's implementation of the ban on the manufacturing, distribution, and use of PCBs. In that regard, we ask that you, as a PCB transformer manufacturer, supply answers to the following questions and copies of all documents described in them.

1. When did Westinghouse stop making PCB transformers for commercial distribution? What were the reasons for cessation?

2. Do you maintain a list of those to whom you supply PCB transformers? If so, after the amended disposal and marking rule went into effect on August 2, 1978, what efforts were made to notify past customers of the potential danger posed by PCB transformers? What efforts if any have been made to assist past customers in the disposal of PCB transformers? Please provide any and all documentation of such notice or assistance.

3. Once the distribution ban became effective on July 2, 1979, what precautions were taken to ensure that equipment used in the manufacturing process was either decontaminated or replaced?

4. What means were used to dispose of contaminated equipment, tools, rags, etc., as well as PCB fluids? Does Westinghouse have ready access to an appropriate disposal area for such items? What are those areas?

5. What measures were adopted to protect workers exposed to these materials or to PCBs otherwise both prior to and following the ban?

MONS 079174

6. What dielectric fluid is being used to replace PCBs?

7. Does Westinghouse engage in the servicing and/or rebuilding of PCB transformers?

We would appreciate receiving your response by November 9, 1979. Any additional information you deem relevant would be welcome.

Thank you for your cooperation with the Subcommittee.

Sincerely,

Bob Eckhardt
Chairman
Subcommittee on
Oversight and Investigations