

Westinghouse Instruction Book



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PCB PRESENCE IN TRANSFORMER OIL
& INDUSTRY SERVICES DIVISIONS POLICY

Information available at this time indicates there is an industry concern that transformer oil may contain minute quantities of PCB. The sampling to date indicates various levels of PCB content in some oil storage facilities, handling equipment, in oil supplied by the oil industry, and in some transformers now in service. Not all locations or transformers in service show PCB content, but sufficient numbers are known, and therefore, warrant immediate revision of procedures.

PCB's in transformer oil is not confined to Westinghouse. Evidence indicates it is spread throughout the industry and involves some customer oil inventories as well as some of our own. No one knows how long it has existed. A logical guess would be for several years. The Industry Services Divisions are taking immediate action to properly dispose of its oil containing PCB and to restore our storage and handling equipment to levels as nearly undetectable as practicable.

No single law, state or federal, covers the whole subject, and it is therefore necessary to look at the situation not only in light of current statutes, but of pending and anticipated legislation. At present, there are no nationally established standards for allowable levels of PCB's in oil for closed electrical systems.

Specifically, four states have current laws covering specific use of PCB and materials containing PCB. These are Indiana, Michigan, Minnesota, and Connecticut. A review of these State Laws is attached. Nearly all states have laws relating to disposition of "hazardous materials" and these have been interpreted to apply to PCB by some states. Of particular importance are the laws relating to contamination

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of natural waterways by PCB. These are especially stringent. Materials known to contain any PCB must not be permitted to enter any public sewer, drains, streams, lakes, or otherwise contaminate any water system.

Industry Services Divisions feel that it is our obligation to make these facts known to our customers. Our policy is to reduce our own oil systems and inventories to the lowest practical level of PCB and observe all precautions to maintain that condition.

It is a customer decision as to what is done with his equipment when the presence of PCB is detected in his equipment. It is our intention to use a 10 ppm break point which does not discount the possibility that at some future time, such contamination may come under regulations governing handling and disposal as askarel. We should make no warranty or implication, written or oral, that assumes any liability in this event, and specific disclaimers are advisable if customers' written orders or other communications seek such warranty.

Reference to State and Federal Laws, as contained herein, is for our use and direction. Our customers have the responsibility to determine for themselves what laws and regulations apply.

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Review of State Laws

INDIANA

- Section 3 (a)** A person shall not sell or manufacture for sale in Indiana the compound PCB.
- (b) Effective July 1, 1977 - A person may not sell a product if it contains concentrations of PCB's greater than 250,000 ppm.
- (c) Effective January 1, 1978 - A person may not sell a product if it contains concentrations of PCB's of 1,000 ppm or more.
- (d) Effective January 1, 1979 - A person may not sell a product if it contains concentrations of 100 ppm or more of PCB's except:
- (1) The Board may determine a lower concentration for a particular product or,
 - (2) If a Federal concentration is lower than Federal concentration will control.
- (e) Notwithstanding Paragraphs a - d, a person may sell PCB's or a product which contains PCB's if it is to be used in a closed system as a dielectric pursuant to rules promulgated by the Board to insure the public health, safety, and welfare.
- (f) An exemption may be obtained notwithstanding Paragraphs a - d in accordance with the provisions of Section 4.

- Section 5** Effective July 1, 1977 - A person shall not use an item, product, or material in the state which contains a concentration of 100 ppm or more of PCB's unless:
- (1) He files a written notice of intention to use and,
 - (2) He files an annual report detailing the total amount of PCB used.

** Covers only newly enacted State legislation specifically on PCB's.
NOTE: General legislation covering disposition of "hazardous" materials exists in almost every state and has been interpreted to apply to PCB's by some states.

- Section 6** Effective July 1, 1977 - Products which contain concentrations of 100 ppm or more of PCB's must be labeled.
- Section 7** Effective July 1, 1977 - A person shall not dispose of PCB's or products which contain PCB's in concentrations of 100 ppm or more except in conformance with rules to be established by the Board.

***MICHIGAN**

- Section 3 (a)** A person may not sell or manufacture for sale in Michigan the compound PCB.
- (b) Effective July 1, 1976 - A person may not sell a product if it contains concentrations of PCB's greater than 250,000 ppm.
- (c) Effective January 1, 1977 - A person may not sell a product if it contains concentrations of PCB's of 1,000 ppm or more.
- (d) Effective January 1, 1978 - A person may not sell a product if it contains concentrations of 100 ppm or more of PCB's except:
- (1) The Board may determine a lower concentration for a particular product or,
- (2) If a Federal concentration is lower, then Federal concentration will control
- (e) Notwithstanding Paragraphs 1 - 4, a person may sell PCB's or a product which contains PCB's if it is to be used in a closed system as a dielectric pursuant to rules promulgated by the Board to insure the public health, safety, and welfare.
- (f) An exemption may be obtained notwithstanding Section 1 - 4 in accordance with the provisions of Section 4.
- Section 5** The Board after hearing may provide for coverage of additional similar compounds.
- Section 6** Effective July 1, 1976 - A person may not use an item or product with a concentration of PCB's of 100 ppm or more unless:
- (a) He files a notice of intent to use and,
- (b) He files an annual report of PCB used.

*In accordance with the Constitution of Michigan, an act does not become effective until ninety (90) days after the end of the Legislative Session unless the Legislature specifically provides that the Act is of immediate importance. Since this provision was not complied with in the Michigan PCB legislation, this legislation does not become effective until April 1, 1977.

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Section 7 Effective July 1, 1976 - A person may not manufacture or sell a product which contains a concentration of 100 ppm or more PCB's unless the product is labeled as containing PCB's with such other information as may be required by rule of the Board. In addition, the manufacturer must file a notice of intent to sell and file an annual report.

Section 8 Effective July 1, 1976 - A person shall not dispose of solid or liquid waste from the use of PCB or a product or material which contains or has contained a concentration of 100 ppm or more of PCB except in conformance with rules promulgated by the Board.

MINNESOTA

- Section 2 (a) Effective January 1, 1978 - No person shall use, sell, purchase, or manufacture PCB or products containing PCB without an exemption certificate. If there is no reasonable alternative or substitute for the PCB that is reasonably available, the director may grant the certificate of exemption.
- (b) Effective January 1, 1977 - No person shall add to a product or material the compound PCB unless the product is conspicuously labeled as containing PCB.
- (c) Rules for exemptions are to be promulgated for July 1, 1977.

CONNECTICUT

- Section 2 (a) Effective July 1, 1976 - No person shall manufacture the compound PCB and no person shall sell the compound PCB without registration with the director.
- (b) Effective July 1, 1977 - No person shall use the compound PCB in the manufacture of a product or offer for sale a product with the compound PCB except in accordance with Section 3.
- Section 3 (a) A product or material containing the compound PCB may be manufactured for sale, sold for use, or used if the compound PCB is in a closed system and labeled in accordance with the American National Standards Institute standards.
- (b) A product may be sold in the state if the concentrations of PCB's in it are only incidental amounts and if they were not the result of exposure to the compound PCB without taking reasonable measures to prevent contamination.

- (c) Additional exemptions for other products may be granted in accordance with Section 4.

Section 5 No person or municipality shall dispose of the compound PCB or any item, product, or material containing PCB unless such disposal is in accordance with a properly issued permit.

In addition to the above enacted laws, the states of Illinois and New York have pending Bills which would limit or control the use of PCB's in those states.

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POLICY PERTAINING TO ASKAREL FILLED APPARATUS

I. The purpose of the following policy is to establish a good faith effort to conform to present and anticipated future laws and regulations - and to continue to render service on askarel-filled apparatus. If you are contacted by customers or sales and it appears that the service required is contrary to this policy, contact the Divisions Marketing Manager or Engineering Manager at Greentree for a review of the services requested and recommendations on procedures to be followed.

A. Do not accept orders for handling askarel in the field. This includes additions or extractions of the fluid, including sampling. Customers should be requested to take their own samples.

B. Askarel-filled equipment will only be accepted for in-plant repairs at the following eight (8) plants:

Philadelphia
Birmingham

Houston
Chicago

Phoenix
Emeryville

Glassport
Portland

C. Stock Askarel --

Only the eight (8) plants listed above are authorized to hold askarel on their premises. Storage facilities at these plants are to be in specially selected facilities with sealed floors. Curbing is to surround the storage area.

Records are to be kept of incoming and outgoing shipments and scrap disposal.

II. Instructions on disposition and control of askarel have been in effect for several years. Specific information is contained in (W) "Instructions for Handling Inerteen Insulating Fluid P.D.S. 54201CM and Installation and Maintenance of Inerteen Transformers" issued in 1971 and revised June, 1976. A copy is enclosed following this page.

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