TECHNICAL RESOURCES

GENERAL ELECTRIC

RIVER ROAD, SCHENECTADY, N. Y. 12305

DIAL COM. TN.

SUBJECT

8*235-2261

STATUS REPORT TO CUSTOMERS ON PCB

July 24, 1972

COPIES:

J. F. Young
J. F. McAllister
J. S. Anderson
C. H. Bascue
J. W. Blake
D. F. Cross
L. L. Dengler
E. L. Dobbins
J. A. Donnelley
R. W. Frahm
D. A. Frenke
W. B. Gaither
C. M. Love
W. P. Hamby
W. T. Kinsey
H. D. Laube
O. H. LeBlanc
W. F. Marx
W. F. Powell
A. Pozefsky
E. L. Raab
J. F. Repko
W. M. Rodgers
E. R. Ruterman
E. L. Simons
H. B. Williams

Messrs. K. H. Christiansen - Agency & Distributor Sales Div.
V. L. Clarke - Apparatus Sales & Service Dept. - Canadian GE
S. W. Corbin - Industrial Sales Div.
J. J. Farrell - Power Transformer Products Dept.
G. H. Hupman - International Bus. Support Operations
L. P. Hart, Jr. - Industrial & Power Capacitor Products Dept.
R. T. Morris - Medium Transformer Products Dept.
I. J. Petersen - Distribution Transformer Products Dept.
D. F. Rankine - Power Transmission & Distribution Dept. - Canadian GE
W. R. Tackaberry - Power Transmission & Distribution Sales Div.
C. C. Thomas - Installation & Service Engrg. Business Dept.
P. C. Van Dyck - Apparatus Services Business Div.

General Electric customers were informed in 1970 of the environmental concern which had arisen over polychlorinated biphenyl materials (PCB's) through the widespread distribution of the "Open Letter to Industrial Customers" and "Open Letter to Electric Utility Customers" and by other means. Since that time a great deal has been accomplished to bring this situation under control. In particular, the responses of cognizant agencies of the federal government have assumed a greater degree of predictability. Now that the Interdepartmental Task Force report has been published, we can give customers additional assurance that there will be a continued source of supply of Pyranol capacitors and transformers and that their application is consonant with the public interest. The accompanying statement has been prepared as a basis for such customer communication, and has been approved by legal counsel of the Transformer and Distribution Equipment Division and the Electronic Components Division.

James S. Nelson

James S. Nelson, Consultant
Product Environmental Compatibility

JSN:ev
Attachment

MONS 056171

RECEIVED
Jul 26 1972

ADVICE TO GENERAL ELECTRIC CUSTOMERS CONCERNING PCB (PYRANOL) (R)

1. FEDERAL GOVERNMENT REPORT SANCTIONS CONTINUED USE OF PCB IN TRANSFORMERS AND CAPACITORS

General Electric customers may continue to purchase and apply General Electric Pyranol transformers and capacitors, secure in the knowledge that all cognizant US government agencies are parties to a report sanctioning the continued use of polychlorinated biphenyls (PCB) in such apparatus. The following paragraph is quoted from one of the findings in which the government's Task Force concurred:

> "6. The use of PCB's should not be banned entirely. Their continued use for transformers and capacitors in the near future is considered necessary because of the significantly increased risk of fire and explosion and the disruption of electrical service which would result from a ban on PCB use. Also, continued use of PCB's in transformers and capacitors pesents a minimal risk of environmental contamination. The Monsanto Company, the sole domestic producer, has reported voluntarily eliminating its distribution of PCB's to all except manufacturers of electrical transformers and capacitors." --PCB's and the Environment, by the Interdepartmental Task Force on PCB's sponsored by the Departments of Agriculture; Commerce; Health, Education, and Welfare; and Interior. Also sponsored by the Environmental Protection Agency, plus other participating agencies. Published May, 1972, distributed by NTIS, Springfield, Virginia 22151, under access number COM-72-10419. The report may be ordered for $6.00.

2. APPLICATIONS IN THE FOOD INDUSTRY

The FDA has issued a proposed rule making concerning the application of PCB's in human foods, animal feeds, and food-packaging material (Federal Register, 37:54-5705, March 18, 1972). From our reading of the proposed rule, it does not appear to be the intent to outlaw either capacitors or transformers when applied in accordance with the manufacturer's ratings and installed separately from that equipment which is in direct contact with the food, feed, or food-packaging material being processed. We have written to the Hearing Clark of the Department of Health, Education, and Welfare with the suggestion that the exemption of capacitors and transformers so applied be made explicit in the final version of the proposed rules. We anticipate concurrence by the Department of HEW, in view of the following paragraph contained in their Draft Environmental Impact Statement of May 8, 1972, regarding the Notice of Proposed Rule Making, Polychlorinated Biphenyls:

> "3. An exception to the proposed special provisions eliminating certain industrial uses of PCB's will permit the continued use of electrical power equipment containing PCB's in regulated establishments. This use of PCB's is considered essential and presents only a minimal risk of accidental contamination of food and the environment."

3. ANTICIPATED LEGISLATION

It will be noted that progress in controlling possible adverse environmental effects from PCB's has come about largely as the result of private industry initiatives in limiting applications to situations which are controllable, i.e., the use of PCB's in sealed transformers and capacitors. As noted in the Task Force report cited above:

> "The government has no power to restrict imports of PCB's by foreign manufacturers and if it disagreed with Monsanto's judgment on allowable uses it could not impose more stringent limitations on Monsanto or on any other potential manufacturer.
>
> "This regulatory gap would be filled by the Administration's proposed Toxic Substances Control Act...."

We see no reason to anticipate that the passage of the Toxic Substances Control Act will affect the continued availability of GE Pyranol transformers and capacitors.

While more restrictive legislation was at one time proposed (by Congressman Ryan of New York), it was prepared before the findings of the Task Force were available, and has never come out of committee.

4. APPARATUS FOR EXPORT

Those intending to export PCB-containing apparatus to certain foreign countries are advised to check for possible import restrictions. Japan and Sweden, for example, are known to have enacted restrictive legislation and/or license requirements.

5. DISPOSAL

The electrical industry, having recognized that continuation of the public benefits resulting from the use of PCB's rests in part upon industry cooperation and success in keeping this material out of the country's water system, has formed Committee C107 of the American National Standards Institute to erect guidelines for the proper handling of PCB's in manufacture and upon ultimate disposal. General Electric intends to promote full compliance with these guidelines, thus helping to implement an additional recommendation contained in the Interdepartmental Task Force Report, namely, "an educational campaign aimed at users to assure proper disposal." The ANSI guidelines are expected to provide for high-temperature incineration of surplus PCB liquids (e.g., fluid discarded from a transformer) and disposal in properly-managed land-fill operations of solid material which has been in contact with PCB's (e.g., discarded capacitors). Three pertinent statements from the Task Force report may be noted in connection with these proposed procedures:

(1) "Incineration at 2000° F or above for two seconds will destroy PCB's...."
(2) "PCB containing material buried in soil is not expected to migrate but should remain in place."

(3) "PCB's are being designated as hazardous substances under Section 12 (of the Federal Water Pollution Control Act), and the authority contained in the section could be used if an accidental spill of PCB's into water should occur." (The referenced authority concerns notification and clean-up responsibilities, etc.)

Pending promulgation of the ANSI guidelines, those with a disposal problem are requested to contact the appropriate General Electric field sales office.