



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 30 1998

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Rodney O. Trower, Vice President
Transformer Disposal Specialists, Inc.
P.O. Box 428
Tonkawa, OK 74653

Dear Mr. Trower:

This is in response to your letter of September 25, 1998 requesting clarification on how the newly published PCB Disposal Amendments (FR June 29, 1998) regulate drained PCB-Contaminated Transformers. You pose a number of questions which will be repeated followed by the Agency's answer.

Q1: *If drained PCB-Contaminated Transformers are now regulated for disposal, are we required to manifest them? If yes, then do we need to show them on our annual document log? If yes, do we need to show the weight of the whole drained transformer like it was over 500 ppm? Will we now have to create a new table to show empty contaminated transformer weights in Kg?*

A1: Drained PCB-Contaminated Transformers are required to be manifested and need to be shown on the annual document log by recording the total weight of the drained unit. You need not create a separate table to show drained contaminated transformers, they may be recorded as you have been recording drained PCB Transformers over 500 ppm. Please note that the issue of manifesting drained electrical equipment was contested by litigants and may change at some point in the future.

Q2: *If a utility company stores a drained contaminated transformer (for disposal) beyond nine months, will this require an exception report to be filed?*

A2: As per 761.60(b)(4)(iii), drained PCB-Contaminated Electrical Equipment is not subject to the storage for disposal provisions. Therefore, neither the one-year disposal clock nor the one-year exception reporting requirement apply to the waste.

Q3: *Transformer Disposal Specialists (TDS) operates a metal recovery oven that is in compliance with 761.72. Is this a performance based decontamination standard or is TDS required to wipe sample all metals after they go through the burning process?*

A3: The metals need not be wiped sampled after going through the burning process if your metal recovery oven is in compliance with 761.72(a).

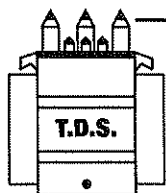
Q4: *Under 761.79 can you decontaminate a PCB-Contaminated Transformer by draining and flushing the transformer keeping in mind that 20% of the average transformer's weight is a porous surface (paper insulation and or wood)?*

A4: The decontamination standards do not apply to intact electrical equipment such as transformers. The surface area in this equipment is very large and may have numerous laminations with a high contact, low volume space limiting the solvent contact necessary for complete decontamination. In addition, as you point out, this equipment contains porous materials which cannot be decontaminated under section 761.79.

If you have any further questions or comments, you may contact Tom Simons of my staff at 202-260-3991.

Sincerely,

John W. Melone, Director
National Program Chemicals Division



Transformer Disposal Specialists, Inc.



September 25, 1998

Mr. Tom Simons (7404)
Fibers and Organics Branch
National Program Chemicals Division
Office of Pollution Prevention and Toxics
U.S.EPA Headquarters
401 M. Street, S.W.
Washington, D.C. 20460

RE: Final Rule

Dear Mr. Simons:

I have a few questions concerning the new rule that I would like to have clarified.

1. If drained PCB-contaminated transformers are now regulated for disposal, Are we now required to manifest them? If yes then do we need to show them on our annual document log? If yes then do we need to show the weight of the whole drained transformer like it was over 500 ppm?

Prior to the new rules TDS has shown the drained residual oil from each contaminated transformer as well as the oil from oil filled contaminated transformers on our log. Will we now need to create a new table to show empty contaminated transformer weights in K?

2. Under these new rules if a utility company stores a drained contaminated transformer (for disposal) beyond nine months will this require an exception report to be filed?

3. TDS operates a metal recovery oven that is in compliance with 761.72. Is this a performance based decontamination standard or is TDS required to wipe sample all metals after they go through the burning process?

4. Under 761.79 decontamination can you decontaminate a PCB contaminated transformer by draining and flushing the transformer? Please keep in mind that 20% of the average drained transformers weight is a porous surface (paper insulation and or wood).

Your attention to these questions is greatly appreciated. If you have any additional questions, please call me at 1-800-874-7067.

Sincerely,

Rodney O. Trower
Vice President

ROT/dft