



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 09 2005

4APT-TS

Mary E. Davis
American Electric Power
501 N. Allen Avenue
Shreveport, LA 71101

Dear Ms. Davis:

The enclosed guidance addresses cleanup of polychlorinated biphenyls (PCBs) spills from electrical equipment damaged by Hurricanes Katrina and Rita, and management of the damaged equipment. This guidance was developed based on input from your organization as well as from others who are engaged in cleanup and recovery efforts in the wake of the hurricanes.

We hope that you find this guidance useful. EPA recognizes the challenges faced by those engaged in hurricane-related cleanup and recovery efforts. We believe that this guidance addresses the needs of those dealing with damaged electrical equipment that may contain PCBs, and spills from such equipment. Based on the information we currently have, we do not believe that additional regulatory flexibility or emergency relief is needed.

Please feel free to share this guidance with utilities throughout the hurricane impacted areas. The guidance will remain in effect through the remainder of this calendar year.

Should you or any of your utility industry colleagues have questions about the enclosed guidance, please contact your Regional PCB coordinator. Contact information for the Regional PCB coordinators may be found at www.epa.gov/pcb.

Sincerely,

A handwritten signature in black ink that reads "Jesse Baskerville".

Jesse Baskerville
Acting Director
Air, Pesticides and Toxics
Management Division

Enclosure

bc: Lou Roberts, EPA Region 6
Maria Dou, OPPT

Guidance for Addressing Spills from Electrical Equipment

EPA is providing the following guidance for addressing spills from electrical equipment damaged by Hurricane Katrina or Hurricane Rita. Areas of primary federal concern include the proper disposal of electrical equipment containing PCBs (i.e., distribution transformers and capacitors). EPA recognizes that individuals, contractors or others involved in removing electrical equipment or utilities restoring electrical service in areas damaged by Hurricane Katrina or Hurricane Rita face difficult circumstances that may impede full compliance. However, in any event, you should take the actions set forth below to the extent feasible.

Efforts to restore the damaged areas to their pre-disaster condition often involve removing or repairing damaged electrical equipment. There may be a natural tendency at this stage to overlook certain hazards, such as those associated with PCBs, that are not immediately life threatening. However, such hazards are serious and may manifest themselves many years from the time of exposure and should be taken into consideration. Given the health hazards associated with PCBs, adequate measures should be taken during emergency situations to minimize exposure.

This guidance remains in effect through December 31, 2005, and applies only to damage and spills resulting from Hurricane Katrina and Hurricane Rita. The guidance in this document supersedes the PCB guidance in EPA's "DEMOLITION GUIDANCE FOR STRUCTURALLY UNSOUND BUILDINGS DAMAGED BY HURRICANE KATRINA."

To the extent feasible, efforts should be made to perform the following steps:

Identifying Downed Electrical Equipment Which May Contain PCBs

Caution! Downed electrical equipment including transformers may still be energized which could cause injury. De-energized capacitors and batteries may still contain a charge.

Downed electrical equipment may contain PCBs

- Generally, transformers that were mounted on utility poles are liquid filled and some may contain PCBs.
- Air cooled or dry type transformers do not contain PCBs.
- In the absence of identifying information, it is best to assume a transformer may contain PCBs. To screen transformers for the presence of PCBs, you can use a field screening test kit. A positive test indicates the potential presence of PCBs. A negative test indicates no presence of PCBs.
- The location of the downed equipment should be identified using e.g., GPS, some kind of visual marker along with a log book with descriptive locations, etc., because this will help you address future clean-up of any spill associated with the downed equipment.

Handling the Electrical Equipment

- If the electrical equipment is intact, it can be stored for reuse, preferably in a clean, dry area.

If the electrical equipment has a small leak that can be controlled so that no additional liquid leaks from the unit, it can be stored for repair and reuse after controlling the leak, preferably in a clean, dry area.

- Intact electrical equipment and equipment that has small leaks that have been controlled can then be shipped without a manifest to a repair facility for evaluation and repair.
- If the electrical equipment has significant leaks, any remaining liquid should be drained into a non-leaking container. If the field screening test kit indicates the liquid contains PCBs, the container should be labeled with the PCB M_L as containing PCB liquids, and ultimately sent to a chemical or hazardous waste incinerator for disposal. The drained electrical equipment carcass should be disposed properly.

If containers with drained liquids must be stored temporarily, they should be placed on hard surface areas, such as a concrete or asphalt parking lot for no more than 90 days.

If the leaking electrical equipment cannot be drained, the electrical equipment should be placed in shipping containers, or covered roll-offs with a poly liner or sorbent material to prevent further spread of the spill, intermodal containers with a poly liner or sorbent material to prevent further spread of the spill, or other weather-tight containers.

If these containers must be stored temporarily, they should be placed on hard surface areas, such as a concrete or asphalt parking lot, for no more than 90 days

- Electrical equipment from parties unable to manage their equipment may be consolidated at electrical utility-owned locations or other temporary storage or staging areas.

Handling the Spill

- Where possible, temporary measures should be implemented to prevent, treat, or contain further releases or mitigate migration to the environment of PCBs.
- Where possible, the location of the spill should be identified to determine if it correlates with downed equipment. Where possible, the boundaries of the spill area should be identified with paint or flags to facilitate future clean-up. Generally, after the equipment has been sent to the repair facility, the presence and concentration of PCBs in the

equipment is determined. This information can be used to address the spill. If the PCB concentration in the equipment was greater than 50 ppm, you should clean-up the spill.

- All soil with visible traces of the spill should be excavated and placed in weather-tight containers, such as a covered and lined roll-off or intermodal container.

If these containers must be stored temporarily, they should be placed on hard surface areas, such as a concrete or an asphalt parking lot for no more than 90 days.

- The excavated material should be disposed in a TSCA or hazardous waste landfill.
- If the spill is the result of an empty or leaking piece of equipment which has not been tested, some testing of the soil may be necessary to identify if PCBs are present. If PCBs are present in the excavated material, the waste should be sent to a TSCA or hazardous waste landfill.

For further information, please contact the EPA Regional PCB Coordinator for your area.




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

NOV 1 2005

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: OECA Concurrence on Guidance for Addressing Spills from Electrical Equipment

FROM: Granta Y. Nakayama 
Assistant Administrator

TO: Susan B. Hazen
Principal Deputy Assistant Administrator
Office of Prevention, Pesticides, and Toxics Substances

Thank you for taking the lead in addressing the evolving environmental issues associated with returning electrical service to areas of the Gulf Coast affected by Hurricane Katrina and Hurricane Rita. We have reviewed your supplemental guidance titled "Guidance for Addressing Spills from Electrical Equipment" and I concur with the issuance of the guidance.

The issuance and use of the guidance is clearly necessary to serve the public interest in this wide-spread emergency and no other mechanism can adequately address the situation within the stipulated timeframe. Therefore, I am also granting a no action assurance from the PCB regulations issued pursuant to Section 6(e) of the Toxic Substances Control Act for persons operating under the terms, conditions and limitations of the guidance. This exercise of enforcement discretion is effective immediately and will continue until midnight on December 31, 2005. Any person conducting operations under the guidance would need to be able to demonstrate the applicability of the guidance to their situation and that their actions are consistent with the terms and conditions of the guidance. Persons operating under this guidance also need to take any necessary actions to protect public health and safety.

If any questions arise concerning this exercise of enforcement discretion, they should be referred to Mr. Gerald Stubbs at (202) 564-4178.