

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 16 1987

Mr. E. E. Hallein
Office of Engineering and
Technical Operations
Voice of America
Washington, D.C. 20547

Dear Mr. Hallein:

This responds to your letter of September 1, 1987 which requests information regarding the proper procedures for disposal of a transformer containing polychlorinated biphenyls (PCBs) that is located at the Voice of America Relay Station in Sri Lanka and which meets the following criteria: (1) originally manufactured in the United States; (2) owned and controlled by a United States Government entity; and, (3) never left the ownership of the United States Government. This PCB transformer will be *shipped* into the United States for proper disposal.

The PCB regulations codified at 40 CFR Part 761 define three categories of transformers according to the concentration of PCBs present in the transformer. Transformers containing 500 parts per million (ppm) PCBs or greater are classified as PCB transformers; transformers containing between 50 and 500 ppm are classified as PCB-Contaminated Electrical Equipment; and transformers containing less than 50 ppm PCBs are classified as non-PCB transformers.

Pursuant to §761.60(b)(1), PCB transformers shall be disposed of in accordance with either of the following:

- (A) In an Environmental Protection Agency (EPA)-approved incinerator that complies with §761.70; or
- (B) In a chemical waste landfill which complies with §761.75; provided that the transformer is first drained of all free flowing liquid, filled with solvent, allowed to stand for at least 18 hours, and then drained thoroughly. PCB liquids that are removed shall be disposed of in accordance with paragraph (a) of this section, i.e., in a §761.70 incinerator or §761.60(e) alternate method. Solvents may include kerosene, xylene, toluene and other solvents in which PCBs are readily soluble.

CONCURRENCES

SYMBOL	ORIGINATOR						
	TS-798	TS-798	TS-798				
SURNAME	Palva	Sant	Raha				
DATE	9/15/87	9/15/87	9/15/87				

JDAVIA:gs/OTS-EED-CRB/09-15-87/TS-798/382-3961/Rm. 118NE/D10A: "HALLEIN"
OTS File/EED File/CRB Chron:Reading File/DS File:Subjct File/Author File

Note that drained PCB transformer carcasses may also be disposed of by an approved alternate method. However, there are currently no commercial approvals for alternate methods of PCB transformer carcass disposal. PCB transformer dielectric fluid must be disposed in a §761.70 incinerator or by an alternate method approved by EPA under §761.60(e). For your convenience, I have enclosed a list of PCB disposal companies which includes PCB incinerators, alternate methods, and PCB chemical waste landfills approved by EPA for commercial operation in the United States.

Since the PCB transformer owned by Voice of America requires shipment back to the United States, I point out the following for transportation of PCBs within the United States: (1) the transformer could be shipped as is, if the transformer is totally enclosed (i.e., intact and non-leaking); or (2) the transformer could be drained of dielectric fluid and the fluid stored and shipped in appropriate containers.

The PCB regulations describe at §761.65(c)(6) that liquid PCBs must be stored in a container which complies with the Shipping Container Specification of the Department of Transportation 49 CFR §178.80 (Specification 5 container without removable head), §178.82 (Specification 5B container without removable head), §178.102 (Specification 6D overpack with Specification 2S (§178.35) or 2SL (§178.35a) polyethylene containers) or §178.116 (Specification 17E container). Remember, in accordance with §761.65(a), any PCB article or PCB container stored for disposal after January 1, 1983, shall be removed from storage and disposed of as required within one year from the date when it was first placed into storage.

Finally, in accordance with §761.40(b), the transport vehicle shall be marked on each end and side with a Large PCB Mark (M_L) if it is loaded with PCB containers that contain more than 45 kilograms (99.4 pounds) of PCBs in the liquid phase or with one or more PCB transformers. Moreover, any PCB transformers or PCB containers must also be marked.

I hope you find this information useful. Should you have additional questions concerning the disposal of PCBs or PCB Items, please contact Joseph Davia of my staff on (202) 382-3961.

Sincerely,

Martin P. Halper, Director
Exposure Evaluation Division

Enclosure