

November 27, 2001

Joe Bailes
Environmental Services Department
South Carolina Electric and Gas Co.
1426 Main St.
Mail Code 146
Columbia, S.C. 29201

Dear Mr. Bailes:

This is in response to your letter of October 15, 2001, concerning the regulatory status of the electrical insulating compound, epoxy, used in small electrical equipment such as Current and Potential Transformers. The data you have provided coupled with discussions you have had with manufacturers, other utilities, and analytical labs, indicate that the epoxy used in Current and Potential Transformers do not and have never contained PCBs.

Given the test data you have provided indicating that the epoxy tested from these Current and Potential Transformers is < 1ppm (the level of detection), and that epoxy would not inherently contain PCBs, these epoxy filled Current and Potential Transformers are not regulated for use or disposal under the Toxic Substances Control Act (TSCA) PCB regulations at 40 CFR part 761. If however, these units were ever serviced with PCBs (i.e., PCBs were added after their manufacture), then they may be regulated based on their PCB concentration.

If you have any further questions or comments, you may contact me at 202-260-3991 or by e-mail at simons.tom@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas G. Simons", with a long horizontal line extending to the right.

Thomas G. Simons, Acting Chief
Fibers and Organics Branch, NPCD

cc: EPA PCB Regional Coordinators