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AUG 28 1985

Mr. L. J. Porter, Jr.
General Manager
Production Department
Western Region
Chevron U.S.A., Inc.
6001 Bollinger Canyon Road
San Ramon, California 94583-0943

Dear Mr. Porter:

This is in response to your August 1, 1985 letter requesting an interpretation of the Environmental Protection Agency's (EPA's) regulations concerning the use of large PCB capacitors in restricted access areas. Specifically, you requested clarification of whether PCB capacitors located near natural barriers (such as cliffs, rivers and roadless foothills) would be considered to be in restricted access electrical substations.

PCB capacitors surrounded by natural or man-made barriers which effectively eliminate public access to the PCB capacitors (and to PCBs spilled from the capacitors) are considered to be in restricted access areas. PCB capacitors located in such areas may be used for the remainder of their useful lives and are not subject to the October 1, 1988 phaseout requirement.

Sincerely,

/s/ John A. Moore

John A. Moore
Assistant Administrator
for Pesticides
and Toxic Substances

CONCURRENCES

SYMBOL	ORIGINATOR						
	a.T.S.						
SURNAME	(Signature)						
DATE	1/23						

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