

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SEP 24 1990

Mark A. Moses, Manager
 Site Environmental Compliance Operation
 Silicone Products Division
 General Electric Company
 Waterford, New York 12188

Dear Mr. Moses:

This is in response to your letter of September 11, 1990 requesting the Environmental Protection Agency's (EPA's) clarification regarding the regulation restricting the storage of combustibles within 5 meters of a PCB Transformer. You state in your letter that some of your PCB Transformers are in electric equipment yards which are surrounded by a fence, approximately 70' X 70'. The PCB Transformers themselves are not individually enclosed (unpartitioned).

Your concern is whether the regulations prohibit the storage of combustible material within 5 meters of the transformer within the fenced in area; or prohibits the storage of combustible material within 5 meters of the exterior of the fenced in area.

The regulations prohibit the storage of combustible materials within 5 meters of a PCB Transformer, within 5 meters of a PCB Transformer enclosure or within a PCB Transformer enclosure. A PCB Transformer enclosure is defined as a confined area such as a vault, machinery room, partitioned area housing a transformer or fenced-in area that contains a PCB Transformer. The regulations intend that such an enclosure is one that is specific to confining or housing that transformer or transformer location and not an enclosure (e.g., fence) that surrounds an entire facility or portion of a facility where a transformer happens to be located.

To illustrate, if the electrical equipment yard you mention in your letter contains or encloses only PCB Transformers it would be considered a PCB Transformer enclosure and the storage of combustible material within that enclosure or within 5 meters of the enclosure (the fence) would be prohibited. If however, within the fenced electrical equipment yard there is included, for example, a loading area for trucks, buildings or structures where employees work, etc., then this enclosure is not specific to confining the PCB Transformers and the only prohibition would be the storage of combustible material within 5 meters of the transformer within the fenced in area.

CONCURRENCES

SYMBOL	TS-798	TS-798	TS-798				
SURNAME	SIMONS	Regan	Regan				
DATE	9/21/90	9/24/90	9/24/90				

SIMONS:tgs/OTS-EED-CRB/9-21-90/TS-798/382-3991/Rm.NE118/Disk#5:B:STORCOMB.GE
 FILES:EED/CRB CHRON READING/SUBJECT:RESTRICTING STORAGE OF COMBUSTIBLES/AUTHOR

EPA would want to look at each of the cases individually; but generally, depending on the location of the transformer within the fenced-in area (in the latter example above) and the size of that area, storage of combustible materials within such a fenced-in area is acceptable provided that the stored materials are not closer than 5 meters to the PCB Transformers themselves.

If you have any further questions or comments, you may contact Tom Simons of my staff at 202-382-3991.

Sincerely yours,

A handwritten signature in black ink that reads "Tony Baney". The signature is written in a cursive style with a prominent loop at the end of the name.

Tony Baney, Chief
Chemical Regulation Branch