

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 27 1993

Mr. Jack Lewis, Vice President
 SUNPRO
 1225 South Main Street
 North Canton, Ohio 44720

Dear Mr. Lewis:

This is in response to your letter of May 10, 1993 requesting a clarification on the proper labeling of equipment in the following scenarios:

- (1) An in-service transformer below 50 ppm PCB with attached bushings known to contain greater than 500 ppm PCBs.
- (2) An in-service transformer 50-500 ppm PCB with attached bushings known to contain greater than 500 ppm.
- (3) Out of service equipment or equipment stored for disposal with the above two scenarios.

Bushings which are in service on authorized transformers are treated under the PCB regulations as having the same concentration as the transformer of which they are a part. The PCB regulations assume that an intact transformer contains the component parts necessary for the transformer to operate. They are, therefore, considered to be authorized for use under the authorization for electrical transformers. Therefore, in scenarios (1) and (2), since the bushings are considered as having the same concentration as the transformer of which they are a part, they need not be marked.

Regarding the disposal of bushings, bushings which have been separated from the transformer are considered separately from the transformer of which they were a part. A bushing that has been separated from a transformer is a PCB article (see 40 CFR 761.3). Because the regulations distinguish between transformers as articles and "other" PCB articles, bushings that have been separated from the transformer are considered to be part of the latter category. Once the bushings are separated from the transformer, they are to be marked and disposed of in accordance with their individual PCB concentration. If the bushings do have a PCB concentration that is different from the transformer it is

T. SIMONSTGS/OPPT-CMD-OB/5-25-93/TS-798/260-3991/Rm.NE118/Disk#8 A: BUSHINGS
 FILES: CMD/OB CHRON READING/SUBJECT: Bushings : In use & at time of disposal

CONCURRENCES

SYMBOL	B-798	TS-798	TS778				
SURNAME	Simon	Reynolds	Bay				
DATE	5/25/93	5/26/93	5/27/93				

attached to, as indicated in scenarios (1) and (2) above, then they must be separated from the transformer before the transformer is disposed of. For purposes of disposal, a bushing above 500 ppm PCB can not be treated in the same manner as a transformer below 50 ppm PCBs.

In sum, while in use and attached to a transformer, the bushing is treated as a part of the transformer and therefore, the same concentration as the transformer. If at any time the bushing is detached from the transformer, it is regulated at its individual concentration. When the transformer is to be disposed of and the concentration of the bushing is different from that of the transformer, the bushing must be removed and marked and disposed of according to its individual concentration.

If you have any further questions or comments, you may contact Tom Simons of my staff at 202-260-3991.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Baney', with a long horizontal flourish extending to the right.

Tony Baney, Chief
Operations Branch