



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

AUG 29 1995

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ron D. Johnson
Sr. Environmental Scientist
Public Service Co. of New Mexico
Alvarado Square
Albuquerque, NM 87158

Dear Mr. Johnson:

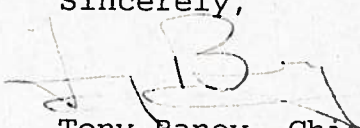
This is in response to your letter of July 19, 1995, in which you request clarification of the status of bushings associated with oil-filled circuit breakers.

As you note in your letter, EPA has already made several interpretations regarding the status of PCB-containing bushings attached to electrical transformers. However, these interpretations have not specifically addressed other electrical equipment with attached bushings, such as circuit breakers, voltage regulators, and other equipment regulated at 40 CFR § 761.30(h) and § 761.30(m).

For purposes of the PCB regulations, bushings on electrical equipment regulated under §§ 761.30(h) & (m) are viewed in the same manner as bushings on electrical transformers regulated under § 761.30(a). Namely, bushings which are in service on authorized electrical equipment (e.g. circuit breakers) are treated as having the same concentration as the equipment of which they are a part. For purposes of disposal, a bushing must be handled separately in accordance with its actual PCB concentration. Regarding servicing for reclassification, since bushings are considered as having the same concentration as the electrical equipment of which they are a part, they need not be serviced separately in order to reclassify the equipment.

Should you have further questions concerning this matter, please contact Peter Gimlin of my staff at (202) 260-3972.

Sincerely,


Tony Baney, Chief
Operations Branch

cc: PCB Coordinators
USEPA, Region I - X



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