



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

JUN 22 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Robert D. Wilson
KeySpan Corporation
175 East Old Country Road
Hicksville, NY 11801-4280

Dear Mr. Wilson:

This is in response to your letter of April 21, 2006 to Sara McGurk of my staff regarding the regulatory status of coal tar wrap greater than 50 ppm PCBs on the external surfaces of some natural gas piping systems. It is your understanding that the contaminated coal tar wrap is an integral component of natural gas pipeline systems and therefore such PCBs greater than 50 ppm are subsumed within the use authorization at 40 CFR part 761.30(i) entitled "Use and reuse of PCBs in natural gas pipeline systems; use and reuse of PCB-Contaminated natural gas pipe and appurtenances".

The above referenced use authorization is for liquid PCBs greater than or equal to 50 ppm inside the natural gas pipeline where the source of the PCBs is contaminated hydraulic oil from turbine compressors. The use of PCBs in coal tar wrap to prevent corrosion on the exterior of the piping has never been authorized by the Environmental Protection Agency. Because its use is unauthorized and there is a potential for exposure, PCB-containing coal tar wrap must be removed and replaced upon discovery. Disposal of this material is covered by the current PCB regulations as PCB bulk product waste at 40 CFR part 761.62.

If you have further questions or comments, you may contact Tom Simons of my staff at 202-566-0517 or simons.tom@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Maria J. Doa".

Maria J. Doa, Ph.D., Director
National Program Chemicals Division