

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 3, 2001

Jamie Garvey  
 Alternative Technologies, Inc.  
 12350 River Ridge Blvd  
 Burnsville, MN 55337

Dear Mr. Garvey:

This is in response to you facsimile of March 16, 2001, concerning the regulatory status of the electrical insulator, butyl rubber, used in some smaller electrical equipment such as current or potential transformers. Your concerns are whether there is an obligation under the PCB regulations to test this material to determine its PCB concentration and whether there is any historical information about this insulating chemical to indicate that it ever contained PCBs.

EPA has no reason to believe that butyl rubber filled small electrical equipment at the time of manufacture would contain anything other than butyl rubber. This seems to be supported by the manufacturers as well. PCBs were not intentionally added to the butyl rubber at the time of manufacture. Therefore, EPA's position is that if it is known that the equipment contains butyl rubber and there is no reason to believe the unit was ever serviced with PCBs in the past, then these small transformers are considered non-PCB Transformers and not regulated under 40 CFR part 761. If both conditions above are true, then you are under no obligation to test these units for purposes of complying with the PCB regulations.

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

Sincerely,

*15/ Margaret Reynolds*

*for* Tony Baney, Chief  
 Fibers and Organics Branch

CONCURRENCES

SYMBOL	7404	7404						
SURNAME	Simons	Reynolds						
DATE	4/3/01	4/3/01						