



POLYCHLORINATED BIPHENYLS (PCBs) POSITION

Background

Because of their non-flammability, chemical stability and electrical insulating properties, polychlorinated biphenyls (PCBs) are used in a variety of commercial applications. There have long been concerns about health issues associated with PCBs and thus their manufacture was banned in 1979. Because the Environmental Protection Agency (EPA) authorized their continued use in certain enclosed applications, PCBs may still be present in older electrical equipment, such as transformers and capacitors.

On April 7, 2010, EPA issued an Advance Notice of Proposed Rulemaking (ANPRM) announcing the agency's plans to eliminate the use of PCBs. The EPA is contemplating a phase-out of high-concentration PCB equipment beginning in 2015, with a complete phase out of PCBs by 2025. Thirty years ago, EPA determined that the use of PCBs in electrical equipment as authorized under its regulations does not present an unreasonable risk of injury to human health or the environment. EPA has not provided any evidence that the toxicity of PCBs is greater than was thought at the time of the original use authorization.

How it Affects Great River Energy

PCBs can be found in some equipment on the Great River Energy system, such as transformers, capacitors and circuit breakers. Great River Energy has a policy to remove equipment that is found to contain PCBs; however, the full extent to which PCBs are present in our equipment is not entirely known. Some equipment is untestable and cannot be identified without the potential to cause significant damage to PCB and non-PCB equipment. In many cases, the process required to identify whether PCBs are present would necessitate widespread service disruptions, create possible North American Electric Reliability Corporation (NERC) violations, damage or destroy equipment and present real and immediate risk to worker safety. Any regulation that would require the identification and removal of all PCBs would come at a very high cost, estimated at greater than \$65 million. This estimate does not include the cost for our 28 member distribution cooperatives.

Great River Energy's position

Great River Energy is opposed to the new measures to eliminate the use of PCBs proposed by the EPA. Imposition of a rigid and arbitrary phase-out timeline for removal of all PCB-containing equipment from service would place a sudden and significant strain on the commercial markets for analysis, disposal and replacement equipment. Such a rigid requirement would likely compromise worker safety and reliability of electrical service. Equipment sampling would also jeopardize the integrity of otherwise intact equipment such as bushings and cable. This would greatly increase the risk of releases to the environment from equipment that was otherwise intact and non-leaking prior to the invasive sampling.

December 1, 2011