

Guideline 1 of 4

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Guideline for Polychlorinated Biphenyls (PCBs) Waste identification, Tracking and Record Keeping



Central Power Research Institute (CPRI)

(An Autonomous Society under Ministry of Power, Government of India) Prof. Sir. C. V. Raman Road, P.B. No. 8066, Bangalore-560 080, India <u>Website: www.cpri.in</u> Email: thomas@cpri.in pcbgroup@cpri.in Phone: +91-80-2207 2428 +91-80-2207 2429

Ministry of Environment, Forest and Climate Change (MoEFCC)

(A Government of India Organization) 6th Floor, Jal wing Indira Paryavaran Bhawan Jor Bagh, New Delhi – 110003, India Website: www.moef.gov.in

United Nations Industrial Developmental Organization (UNIDO)

UNIDO Headquarters Vienna International Centre Wagramerstr. 5 P.O. Box. 300, A-1400 Vienna, Austria <u>Website: unido@unido.org</u>

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1. FOREWORDS

The main purpose of this document is to provide practical indications for the identification and labeling of electrical equipment containing Polychlorinated Biphenyls (PCBs) in India. This activity is a part of the UNIDO/GEF funded project "Environmentally Sound Management and Final Disposal of PCBs in India"

The results obtained during the first and second round of PCBs inventory in India, carried out under the project "Development of National Implementation Plan (NIP) in India as a First Step to Implement the Stockholm Convention on Persistent Organic Pollutants (POPs)" have been taken into consideration.

The purpose of this document is:

- To provide practical guidance to relevant Indian stakeholders and authorities to extend the PCBs inventory by conducting further questionnaire survey and to adopt a more formalized approach.
- To propose a simple and effective system for labeling, tracking and record keeping of PCB-contaminated equipment.
- To upgrade the inventory with those equipment and industrial sectors that was not taken into account in the first and second PCBs inventory.

2. INTERNATIONAL CONVENTIONS ON POPS & HAZARDOUS WASTES

2.1. STOCKHOLM CONVENTION

India is a member to the Stockholm Convention on POPs. In this Convention, Annexure C (Unintentional Production), Part IV (Definitions) defines PCBs as the following.

"Polychlorinated biphenyls" means aromatic compounds formed in such a manner that the hydrogen atoms on the biphenyl molecule (two benzene rings bonded together by a single carboncarbon bond) may be replaced by up to ten chlorine atoms".

Part II in Annexure A (Elimination) of this Convention specifies

The measures to be taken to eliminate the use of PCBs in equipment (e.g., transformers, capacitors or other receptacles containing liquid stock) by 2025 and to reduce exposures and risk to control the use of PCBs.

2.2. BASEL CONVENTION

India is a Party to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

The overall objective of this Convention is to protect human health and the environment against the adverse effects of hazardous wastes. Its scope of application covers a wide range of wastes defined as "hazardous wastes" based on their origin and/or composition and their characteristics (Article 1 and Annexures I, III, VIII and IX), as well as two types of wastes defined under "other wastes" (household waste and incinerator ash; Article 1 and Annexure II).

The provisions of the Convention center around the following principal aims:

- the reduction of hazardous waste generation and the promotion of environmentally sound management of hazardous wastes, wherever the place of disposal;
- the restriction of transboundary movements of hazardous wastes except where it is perceived to be in accordance with the principles of environmentally sound management; and
- a regulatory system applying to cases where transboundary movements are permissible.

Annex I of the Convention summarizes the Categories of Waste to be controlled.

List A1 and A3 in the Annex VIII of the Convention lists the Metal and Metal-Bearing Wastes and the Wastes Containing Principally Organic Constituents which may contain Metals and Inorganic Materials respectively, and A1180 and A3180 describes the one applicable to PCBs, PCTs or PBBs.

2.3.GLOBALLY HARMONIZED SYSTEM (GHS) OF CLASSIFICATION & LABELLING OF CHEMICALS

The Globally Harmonized System of Classification and Labeling of Chemicals (GHS) is a logical and comprehensive approach to define health, physical and environmental hazards of chemicals; creating classification processes that use available data on chemicals for comparison with the defined hazard criteria; and communicating hazard information as well as protective measures on Labels and Safety Data Sheets.

The Ministry of Environment and Forests, Government of India has published the Hazardous Substance (Classification, Packaging and Labeling) Rules, 2011 (draft) to keep in-line with the GHS rules.

3. INDIAN LEGISLATION ON POPS & HAZARDOUS WASTES

The Indian Legislation on POPs and Hazardous Waste is drafted by the Government of India in the Ministry of Environment and Forest in the Hazardous Wastes (Management, Handling and Transboundary Movement) Rules, 2008.

Procedure for the Handling Hazardous Wastes is covered in Chapter II while the Import and Export of Hazardous Wastes is established under Chapter IV and Chapter VI deals with Packaging, Labeling and Transport of Hazardous Waste.

The Hazardous Waste Rules, 2008 requires that *the hazardous waste are packaged and labeled*, *based on the composition in a manner suitable for safe handling, storage and transport as per the guidelines issued by the Central Pollution Control Board from time to time* (Chapter VI, Article 19).

For the movement of hazardous waste within the country, the hazardous waste is subjected to the Manifest System (Chapter VI, Article 21).

Under Schedule VI, rule 13(4) of the Hazardous Waste Rules, 2008, for Hazardous Wastes Prohibited for Import and Export, the import and export of Waste, Substances and articles containing, consisting of or contaminated with polychlorinated biphenyls (PCB) and/or polychlorinated terphenyls (PCT) and/or polychlorinated naphthalenes (PCN) and/or polybrominated biphenyls (PBB) or any other polybrominated analogues of these compounds is prohibited.

4. GUIDELINES ON IDENTIFICATION OF PCBS CONTAINING EQUIPMENT AND WASTES

The fundamental literature reference documents considered for the guidelines on identification of PCBs containing equipment and wastes are:

- UNEP, Guidelines for the identification of PCBs and materials containing PCBs, 1999
- UNEP, Inventory of PCB-Containing Equipment, 2002
- James Willis, PCB Inventories: Approaches to Compiling Inventories of PCBs, PCB-Containing Equipment. Proceedings of the Sub regional Workshop on Identification and Management of PCBs and Dioxins/Furans, La Habana, Cuba, April 23-26, 2001

4.1. THE PCBS INVENTORY IN INDIA

For planning the extension and updation of the inventory, the geographic area of country was divided into five regions: North, South, East, West and Central.

A list of addresses of various utilities and energy intensive industries covering different sectors like power generation and distribution stations, defence, petrochemicals, steel, cement, railways, fertilizer, paper and pulp, nuclear, shipping, etc., was compiled and letters, questionnaires, and inventory forms were sent to them throughout the country. Several general and 'at the organization site' PCB Awareness Raising programmes were conducted throughout the year. Based on the Inventory areas, a list of industries which own 'pure PCBs' (hazardous) and 'PCB contaminated oils' (highly toxic) were formed.

The response to the letters and inventory forms was analyzed and the following procedures were adopted for the estimation of PCBs:

- If the nameplate declared that the transformers were filled with PCBs, the quantity of PCBs was estimated from the data available on the nameplate.
- In case of transformers installed before 1985, oil samples were collected and tested for PCBs content, and the quantity of the PCBs contaminated oil was determined.
- Transformer oil samples are tested whenever 1) it is not declared as a pure PCB containing transformer, or the density test is negative; 2) the transformers originate from a foreign country known to have produced PCBs.
- Although only those transformers which were installed before 1985 have been tested for PCBs content, cross contamination in transformers installed after 1985, or mineral oil transformers were also checked for PCBs content. This was done if PCBs were found in most of the older equipment within the particular organization and the possibility of cross contamination was suspected based on the organization reporting activities such as topping up, filtration etc. by using common equipment and tools etc.

Main outcomes of the inventory were as follows:

- PCBs have never been produced in India. However, some Indian transformer companies were licensed by foreign companies for the production of PCBs containing transformers.
- Large number of transformer oil samples was drawn from power utilities and major industries (both public and private sector organizations). Many organizations were found to own either pure PCBs or PCB contaminated oil.
- Based on the inventory and determination of concentrations of PCB obtained, the inventory was segregated as pure and Hazardous or highly toxic and toxic.
- An updated inventory of organizations containing pure PCBs and PCB contaminated oil has been prepared in June 2015 with details of the transformers and their locations. The inventory

data shows that around 2500 tons of pure PCBs (additional 7500 tons, washings of pure PCBs equipment) and nearly 8000 tons of PCB contaminated oil exist in the country.

The shipbreaking activity could represent as another source of PCBs, where the ocean liners imported for ship-breaking contain PCBs material. This area has not been widely addressed although samples from Alang shipyard have been collected and analyzed for PCB content. Further, the following aspects still need a more thorough approach:

- 1. The PCBs inventory only covered PCBs transformers. Majority of them were online transformers, while offline or stored transformers were identified only in a few cases.
- 2. The relative number of industries covered by the inventory is low, when compared to the number of industries that exists in the country. Several states were not covered in the PCB inventory.
- 3. Capacitors and other PCBs containing electrical equipment were not considered in the inventory.
- 4. While significant steps have been taken to ensure that the PCBs filled equipment identified in the inventory are traceable: however the labeling of the PCBs containing equipment is not yet completed and has been performed only in a limited way. This aspect is being addressed in the coming months of 2015.

This document is aimed at providing a general methodology for the extension and updating of the PCBs inventory in India, starting from the information provided in the first inventory, and addressing its limitations.

4.2. PERFORMING QUESTIONNAIRE SURVEY ON PCBS

4.2.1. GENERAL DESCRIPTION OF THE QUESTIONNAIRE FORMS

The PCB Inventory form (UNEP 2002) has been adopted as the reference form for the inventory of PCBs wastes and PCBs contaminated sites. Section A and B of the form have been slightly modified, while Section C remains as given in the standard form. These forms have been modified into an electronic worksheet for the purpose of record keeping, post elaboration and also for a more standardized use of terms, as most of the terms would be selected from a standard dropdown list. The hardcopy can be used for recording data during field survey. The forms contain a Site Univocal Code which is the same for all the forms pertaining to a particular site.

Descriptions related to some of the fields in the proposed forms are:

Section A

- **Record Number**: A Univocal Numeric Code for identifying the site.
- Geographical coordinates: In addition to the address.
- **Type of company, industry type at the specific site:** The Industry is classified according to the Indian National Industry Classification 2008 (Central Statistical Organization Government of India). The NIC-2008 list of industrial classification adopted is reported in Annexure 1.
- Location: Industrial zone: Urban area, Rural area, Park, or Natural Land, Others.

Section B

- Record Number: Same as in Section A
- **Type of equipment:** Step Up transformer, Power Transformer, Distribution Transformer, Capacitor, Switch, Other. In addition to power rating, minimum and maximum voltages of transformers are to be mentioned
- Size (length, width and height): Not considered a mandatory requirement. It may be roughly estimated from the power rating and weight.

- **PCB concentration in the dielectric oil:** In ppm.
- **Operational status of the equipment:** In use, Stand-by, Under maintenance, Decommissioned.
- Condition of the equipment: Good, Rusty / Overheated, Damaged but not leaking, Leaking.
- Storage: Open air; Open air / Locked; Indoor; Indoor / locked.

Section C

- Record Number: Same as in Section A
- **Type of waste:** Information on the Univocal Identification of the type of waste, as per the Basel Convention Classification Code and the Indian Waste Classification code.
- **Packaging modality:** None, Plastic or Steel drums, Paper or Plastic bags, Large containers. ADR code (European Agreement concerning the International Carriage of Dangerous Goods by Road) if available.
- Storage: Open air; Open air / Locked; Indoor; Indoor / locked.
- Geographical coordinates
- Land use of the site and of the surroundings: As per the Indian classification of land uses.

Cite Deserved	Site code	(to be repeated in form "B" and "C")
information	Date	
mormation	Inspector	
. .	Company name	
Information	Company type (NIC-2008)	*
company	Public / Private	
company	Headquarter address	
	State	*
	Site address	
	Geo ref. (°)	
Site Contact	Location features	*
and Address	Contact person's name	
Information	Contact person's position	
	Phone	
	Fax	
	Email	
	Number of Staff at the site	
	Number of Transformers	
	Number of Capacitors	
Site Information	Number of other equipment	
	Electricity Consumption at site (KWh)	
	PCB Elimination plan?	

4.2.1.1 FORM "A": INFORMATION CONCERNING THE SITE AND THE PCB OWNER.

Fields marked with * will be selected from a dropdown list in the electronic format of the forms

4.2.1.2FORM "B": INFORMATION CONCERNING THE EQUIPMENT.			
	Site Code	(same as in A)	
	Label Code	(univocal code for ea placed on the label)	ch equipment, to be
Equipment identification	Name of the Manufacturer		
	Country of origin		
	Equipment Type	*	
	Serial Number		
	Power rating		
	High Voltage (V)		
	Low Voltage (V)		
	Manufacturing date		
	Equipment weight, including dielectric oil (Kg).		
Equipment description	Oil Weight (Kg)		
	Trade name of the dielectric oil or insulating oil.		
	PCB content in the liquid (ppm).		
	PCB analysis performed.	*	
	Information source.		
	Operational status.	*	
	Condition of the equipment.	*	
	Storage.	*	
Equipment condition	Retro filled (Y/N).	*	
	Retro filling date.		
	Retro filling liquid.		
	Maintenance company.		
Fields marked with * will be selected from a dropdown list in the electronic format of the forms			f the forms
4.2.1.3FORM "C". INFORMATION		CONCERNING	WASTE AND
Site Code			
	Sile Code	and Indian Wast	(same as in A)
Classification code.		code and indian waste	
	$\mathbf{E}_{\mathbf{r}}(\mathbf{i}) = \mathbf{r} + \mathbf{i} + \mathbf{r} + \mathbf$		

	Site Code	(same as in A)
	Type of Waste including Basel code and Indian Waste Classification code.	
	Estimated quantity (kg.).	
PCBs	Packaging modality.	*
Waste identification	Are the containers leak proof?	
	Storage conditions.	*
	Geographical coordinates.	
	Site Name.	
	Land use of the site and of the surroundings.	
PCB contaminated Site	Monitoring report if available (attach documents).	
Identification	Clean-up plan if available (attach documents).	
	Clean-up report if available (attach documents).	
T'11 1 1 1/1 4		(C (1 C

Fields marked with * will be selected from a dropdown list in the electronic format of the forms

4.2.2 STEPS INVOLVED IN PERFORMING THE QUESTIONNAIRE SURVEY

The following picture outlines the general arrangement and steps involved in carrying out the PCBs inventory.



General arrangement and steps involved in carrying out the PCBs inventory.

Table 4 describes the steps involved in carrying out the PCBs inventory in detail.

Table 1: Steps involved in performing a PCBs questionnaire survey		
Description of the Steps	Status of the existing PCB inventory	
 Description of the Steps 1. Establish a proper institutional collaboration. Electric power institutions, state and local level environmental authorities (like the Pollution Control Boards) are the key actors for performing a successful inventory. The electric power institutions provide important information about the owner of the electric equipment (on electricity production and consumption); while the Pollution Control Boards have important information on environmental monitoring, waste storage sites, environmental conditions of industries or electrical facilities, etc. It is important to secure the cooperation of industrial associations and industries to guarantee that the information concerning the use or end life of the electrical equipment is provided. 2. Identify and select the relevant industrial sectors where PCBs equipment and PCBs containing waste can be found. UNEP (2002) suggests considering the following industrial sectors as main candidates for the PCB inventory Electric utilities; Industrial facilities (Aluminium, copper, iron and steel, cement, chemicals, plastics, synthetics, petroleum refining industries). Railroad systems; Underground mining operations; Military installations; Research laboratories. 	Status of the existing PCB inventory Status of the preliminary inventory with reference to Step 1: A 2-phase inventory development has been completed. The sectors addressed are: power (generation, transmission, distribution, thermal / hydel, nuclear), cement, fertilizers, Ship breaking, ferrous and non-ferrous, paper and pulp, railways, environmental etc. However, this is an on-going process as efforts to identify newer stocks of the hazardous chemical (PCBs) will be continued to minimize any unidentified PCBs stock in India. Status of the preliminary inventory with reference to Step 2: In India, the following sectors were selected as relevant sectors for the PCBs inventory: • Defense. • Electric power generation and distribution. • Fertilizer. • Pulp and Paper. • Petrochemicals. • Pharmaceuticals. • Railroad systems. • Ship Breaking / Recycling. • Cement manufacturers. • Iron and steel and Non-ferrous. • Nuclear Power plants.	
 3. Draft an inventory plan and establish an inventory database, starting from the addresses of the industries. A database containing information listed in the inventory form A, sections "Site Record info"; "Information about the company ", and "Site Contact and Address Information" should be established. 	Status of the preliminary inventory with reference to Step 3: An updated database of industries identified separately as 'Pure PCBS owners' & 'PCBs contaminated oil owners' is completed. It includes owners contact information, PCB concentration & the tonnage. It is constantly being updated with information involving accessibility etc. to the affected equipment for performing the decontamination activity.	

 4. Training. Training is a fundamental step to ensure that the staff performing the inventory is clear with the objective and criteria, and shares the same standards and methodology. Workshop sessions aimed at informing the representatives of all the possible PCBs owner sectors, relevant stakeholders, and operators should be held. 	Status of the preliminary inventory with reference to Step 4: In addition to the > 45 awareness meetings/workshops that have been held since Jan. 2009, PCB Awareness- raising and owners training presentations have been made to many organizations and the maintenance personnel at their site. FAQs pertaining to awareness (in many regional languages as well) and owner organizations have been distributed during the visits.
5. Dispatch of all the inventory forms. The dispatch of inventory questionnaires should be performed by the most effective means: email, fax, post, depending on the infrastructure available.	Status of the preliminary inventory with reference to Step 5: inventory questionnaires as well as email/Fax and Letter inquiries have been sent to various industries.
 6. Interviews and follow up. After sending inventory questionnaires to the industries, a follow up activity should be conducted. The follow-up should include: a. Establishment of direct contact (by phone or mail) with the addressees of the questionnaires to verify the receipt of the forms / questionnaires and to assist them in the compilation of the questionnaires if required; b. Site visit to relevant number of potential owners of PCBs containing equipment/ wastes. 	Status of the preliminary inventory with reference to Step 6: The responses are compiled; if no response received, telephonic contact is established, concerned person is identified, information provided, nameplate details of suspected equipment obtained, oil samples tested and reports are sent followed by continual updating of the inventory.
7. Sampling and analysis. Sampling and analysis of the dielectric oil in a relevant statistical sample of transformers or other electrical equipment, including mineral oil transformers, distribution transformers, and stored equipment should be performed.	Status of the preliminary inventory with reference to Step 7. All the transformers suspected to contain PCBs (manufactured and installed before 1985) are inspected and oil sample analysed. Further work is taken up if cross contamination in transformers installed after 1990, or mineral oil transformers are suspected after detailed interaction with owner organization. This is an on-going exercise.
8. State level authorities should assign Univocal Codes to the inventoried PCBs equipment and deploy them to the owners of the PCBs containing equipment; this activity is further explained under the Labeling section in this document.	Status of the preliminary inventory with reference to Step 8. Labeling of PCBs contaminated equipment and the consequent traceability of the equipment are ensured in the course of the preparation of the PCBs inventory. This is an on-going exercise, being carried out throughout the year.

4.3 PCBS USES

PCBs applications can be classified under: closed, partially closed and open applications.

4.3.1 CLOSED APPLICATIONS

A closed application is defined as "An application in which the PCBs are held completely within the equipment". In normal conditions the exposure of the PCBs contained in the closed application to the environment or humans is nil. However, exposure may occur under circumstances during maintenance, operations, damage to the equipment due to aging of the equipment or misuse.

Step up transformers	Power plants	
Distribution transformers	Power plants, transformer substations, electricity distribution networks, large industrial plants, railways, large ships, hospitals.	
Power capacitors	Electricity distribution networks, large industrial plants	
Lighting ballasts	Offices, large buildings, hospitals	
Switches	Transformer substations, electricity distribution network, large industrial plants, railways, large ships	

4.3.2 PARTIALLY CLOSED APPLICATIONS

In partially closed applications, PCBs is not directly in contact with the environment. However, emission to the environment may occur during typical use, leading to significant releases of PCBs in some cases. A typical example is the PCBs contamination in the gas pipes due to the release of PCBs present in the compressor oil of "compressor blow-by". Two major PCBs accidents in the world (the Yusho accident in Japan in 1968, and the Yu Cheng accident in Taiwan ten years later) were caused by the contamination of rice oil due to an accidental release of PCBs after a leak in the heat exchanger.

Heat transfer fluids	Chemical industry; petroleum refineries.
Hydraulic fluids.	Any industrial process requiring hydraulic fluids, Mining equipment; ferrous and Non-ferrous metal industry.
Vacuum & compressors pumps.	Natural gas transfer substations and pipes; any industrial facility requiring large compressors or vacuum pumps.

4.3.3 OPEN APPLICATIONS

PCBs have been used as an additive in paints, flame retardant in surface coatings, plasticizers in chlorine based plastic and rubber like PVC and neoprene.

Lubricants	Immersion oil for microscopes; brake linings; cutting oils; lubricating oils		
Casting waxes	Pattern waxes for casting		
Surface coatings Paints (including the ones used for ship painting); treatment for textiles; carbonless copy paper; flame retard			
Plasticizers	Gasket sealers; filling materials; PVC; rubber sealers		

4.4 PCBS CONTAMINATED TRANSFORMERS: BRAND NAME

A partial list of the trade names/manufacturers of likely PCBs containing transformers as obtained from the PCBs inventory in India is given below.

(1) A.C.E.C Belgium, (2) Ambarnath X"mers, (3) ANDREW YULEAPEX, (4) APEX Electrical (5) Ashok TRF, (6) ASKAREL, (7) BBL/INDIA, (8) BHARAT BIJILEE, (9) BHEL (10) Ashok TRF, (11) Canadian, (12) Crompton Greaves, (13) Crompton Parkinson, (14) CZECH, (15) EARCS, (16) ECE, (17) Economy, (18) Electric Factory TRF S.E.C, (19) EL-TRA, (20) EMCO, (21) ETE, (22) ETEA, (23) GANZ Hungary, (24) GCE, (25) GEC Alstom, (26) HACKBRIDGE-HEWTTIC & EASUN (HHE), (27) HBB, (28) HEL, (29) HHE Madras, (30) Hind Rectifiers, (31) Hindustan Electric, (32) IMP, (33) IND Coil, (34) Indian, (35) INDOTECH, (36) Johnson & Philips, (37) Johnson Elect Co, (38) KAVIKA, (39) KEC, (40) KEC India, (41) KEL, (42) KIRLOSKAR/INDIA, (43) M/S Bharat, (44) M/s Bharat Bijlee, (45) M/s BHEL, (46) M/S BHEL Bhopal, (47) M/S NGEF, (48) M/s TELK, (49) Marsons Electricals, (50) MERLIN GERIN ELECTRO/FRANCE, (51) Metro Politian Vickers, England, (52) Mitsubishi, (53) National Elec Ind, (54) Nelson Electricals Bombay, (55) NGEF Licence AEG,India, (56) NGEF/INDIA, (57) P&CT L, (58) PARCS, (59) Power Lite, (60) Radio & Electricals Ltd, (61) RUSSIAN, (62) Star Delta Electrical, (63) T&R, (64) TELK, (65) TELK/INDIA, (66) Thane Electric Supply, (67) The National Electrical Industries Ltd, Bombay, (68) TR & SWITCH GEAR Ltd, (69) Volt Amp, (70) VOLTAS.

4.5 TRADE NAMES OF PCBS

The list of the trade names of the dielectric oil containing PCBs (based on inventories conducted in India) is given below.

CLOPHEN, SOVTOL, Mineral insulating oil, Trf Oil, Power oil, Naphthenic, Insulating Oil, R-Temp, Askarel, Electrol, Silicon Oil: Clophen, Sovtol and Askarel are the most commonly found pure PCBs in the PCBs inventory in India.

4.6 PCB CONTAMINATED CAPACITORS: BRAND NAME

The first as well as the second PCBs inventory in India did not cover either capacitors or switches although enquiries regarding this have been made in all communications. PCBs capacitors with an internal volume greater than 5 liters fall within the scope of the Stockholm Convention (identification, labeling and phasing out) and therefore should be considered in the PCBs inventory. A list of trade names of power capacitors containing (or suspected to contain) PCBs and their production year is been provided below.

A partial list of the trade names/manufacturers of likely PCBs containing power capacitors as obtained from general published literature is given below.

(1) AEG Hydra, Berlin, (2) Arcotronics, (3) Italy (4) AseaKabel, Sweden (5) Asea – Lepper (or Dominit or Brilon D) (6) Baugatz Ludwig, Berlin (7) BaugatzKondensatorien, Austria (8) BICC Capacitors LTD, Helsby England (subsequently commercialized as ABB capacitors) (9) Brandt W. Gmbh, Leopoldstadt, Lippe (10) CAF Kondensatoren, Duisburg – Hamborn (11) Comar Condensatori, Italy (12) Cond. Fribourg, (13) Detron Stein (14) Dubiler, England (15) Ducati EnergiaSpA, Italy (16) Egra KG, (17) Elcontrol spa, Italy (18) ElectroniconGmbh (19) Elektrica (F.Kucera) (20) Elektrica (F.Kucera) (21) ElkondaGmbh, Germany (22) Felten + Guilleaume, Energietechnik, Cologne, Germany (23) Frako, Teningen (24) General Electric, Usa (25) Grunow Ernst KG, Monaco (26) Haefely SA, France and Germany (27) Hitachi, Japan (28) Hunts, England (29) I.B.M, Usa (30) ICar – Slimotor (31) Internally, USA (32) IskraSemic, Yugoslavia (33) IsokondGmbh, Germany (34) Italfarad Spa, Italy (35) Jensen Tobias, Denmark (36) Otto Junker, Gmbh, Germany (37) Kapsch&Sohne, Austria (38) KD Kondensatoren, Monaco, Germany (39) Knobel, Emenda GL (40) Konig, Vienna (41) Leclanché, SA, France (42) Liljeholmens, Kabel AB, Stockholm, Sweden (43)

Leopold Vlk, Pocking Niederbayern (44) Lorenzetti, Brasileira (45) Mallory Capacitors, USA (46) Mikafil AG, Switzerland (47) NCC (48) Neuberger Gmbh (49) Neuko, Germany (50) Nokia Capacitors, Finland (51) Pressey TCC, England (52) Rectiphase SA, France (53) Richmont (54) RoedersteinGmbh (55) Ruppel& Co, Germant (56) Saarland Kondensatorenbau (57) Si Safco Colombes, France (58) Si Safco Colombes, France (59) Siemes AG Dynamowerk, Berlin (60) STR Standard Telephon + Radio (61) SükoHerrsching D (62) System Electric Gmbh (63) Tesla, Czechoslovakia (64) Thomson (65) UnitraTelpod, Polski (66) Varilec SA, France (67) Varo S.R.L, Italy (68) VA-RU Kondens, Eckernförde D (69) Vauka MPKO GmbH (70) Vlk Leopold, Pocking (71) Wegowerke, Rinkling + Winterhalter,Freiburg / Breisgau D (72) Wico, Japan (73) Xamax AG, Embrach (74) Zeh Wilhelm KG, Freiburg / Breisgau (75) Zellweger, Uster ZH.

4.7 INDUSTRIAL SECTORS WHERE PCBS CONTAINING CAPACITORS ARE USED

In general, capacitors are used to compensate for the inductive reactive power required by the electrical load. Power capacitors can therefore be found in:

- Buildings: Administrative buildings, Hospitals, Museums, Railway Stations, Shopping Centers and large buildings, in general (including the old buildings planned for demolition)
- Workshops and Industrial Manufacturing units;
- Wastewater treatment plants
- Power generation and power distribution substations;
- Refrigeration facilities;
- Research institutions.

5. SAMPLING AND ANALYSIS OF ELECTRICAL EQUIPMENT

TRANSFORMERS

Sampling of the dielectric oil from the electrical equipment usually requires temporarily shutting down and fully de-energizing the equipment, so that the risk of electrical shock to the operators can be minimized. Transformers (except the very small ones) are usually provided with one or more dielectric oil drainage valves from which the oil can be sampled. While sampling from small transformers, which are not equipped with circulation pump, it is important to drain the oil present in the drainage valve and pipes before taking the sample. All counter-measures to avoid spilling of PCBs oil on the soil should be adopted, and operators should wear proper Personal Protective Equipment (PPE). Oil sampling should be preferentially undertaken from the drainage valve at the bottom of the transformer instead of the expansion tank at the top. The following procedure should be followed for sampling from transformer:

- Obtain a clear plastic tubing (Tygon).
- Attach one end of the tube to the electrical equipment sampling outlet valve and place the other end of the tube in an overflow bucket or pan.
- The tubing between the transformer and the bucket should be as short as possible to avoid leakage potential.
- Drain some quantity of oil through the sample valve and tubing into the overflow bucket or pan to ensure that no contaminants are present in the sampling line. Close the sample valve.
- Place the tubing in a sampling container or bottle.
- Open the sampling valve of the transformer and fill the sample container or bottle.

- When the sampling container or bottle is filled with the required quantity of oil, close the sampling valve.
- Secure the cap of the sampling container or bottle tightly.
- Label the sampling container or bottle with the appropriate information or details. Ensure that the label clearly addresses all the categories or parameters.
- Complete all the chain-of-custody documents and record them in the field logbook

CAPACITORS

Since PCB capacitors are sealed equipment, it becomes necessary to drill a small drainage hole for sampling oil at low speed and to avoid overheating of the capacitors body with possible burning of PCBs oil. Hence, it is mandatory to put the capacitor offline and completely de-energize it before starting the sampling procedure. All countermeasures to avoid spilling of PCBs oil on the soil should be adopted, and the operators should wear proper PPE. Once these capacitors are drilled for sampling, they cannot be used anymore. Thus, sampling of PCBs capacitors cannot be carried out if the equipment is still in use. After the completion of the drilling operation, the sampling procedure is performed in the same way as described for the transformers.

5.1. LABELING AND STORING SAMPLES

Wide-mouth glass jars with PTFE caps must be used for storing samples. Sample volume must be sufficient enough to perform several analyses: a volume of at least 200 ml is recommended although even 100 ml is sufficient to carry out a few repeating analyses.

During the sampling activity, at least one person responsible for the analytical work should be present, in order to detect any sampling anomalies that could affect the analytical work, and to verify the sample code. The sampled equipment should neither be moved nor should any further maintenance operation be carried out until analytical results are confirmed, and till the need for further sampling is excluded. If, for some unforeseen reasons, the need to move or carry out maintenance activity of the equipment arises before analytical results, the analytical laboratory must be immediately informed. The analytical lab must inform the equipment owner on the analytical results without delay. Samples must be immediately sealed and labeled. On the label, the following information should be written:

- sampling date and time,
- equipment serial number (the same entered in Form "B"),
- sampling serial number,
- Operator's name and reference.

Digital photo of the sampled equipment should be taken. The above information, including the digital photos, should be recorded in the data base, which will also contain sampling results, for future reference. PCBs are persistent substances not expected to degrade significantly. However, certain isomers can degrade more quickly when directly exposed to light. Hence, it is recommended to store the samples in a cold place at low temperature, and to perform analysis within one or two weeks after sampling.

5.4 PERSONAL PROTECTIVE EQUIPMENT (PPE) TO BE USED DURING SAMPLING

Before starting the sampling operation, a complete survey of the workplace should be conducted to identify and assess possible hazards. If no significant hazards are identified, other than the PCBs in

the dielectric oil to be sampled, the PPE to be adopted during sampling operation can be limited to a disposable suite, goggles and a proper chemical resistant glove. Wearing respiratory mask is not necessary as the risk of inhalation during sampling is limited. However, if the survey identifies possible PCBs contamination of the site, the operator should also wear protective shoes, respiratory mask and a protective suite. Wearing helmet is generally mandatory in workplaces. It is recommended that a certain amount of different PPE in compliance with the OSHA standards be made available to the sampling team before carrying out the sampling campaign.

5.5 PRELIMINARY ANALYSIS BY FAST KITS AND PORTABLE EQUIPMENT

While selecting the proper screening method for preliminary analysis of PCBs oil on field, the risk of false positive and false negative outcome should be carefully considered. Colorimetric or ion specific electrode methods based on the detection of chlorine – and subsequent normalization on the basis of the expected chlorine content in the PCB mixture – may be affected by a high false positive outcome if the dielectric oil contains other chlorinated compounds (for instance, Chlorobenzene) instead of PCBs. In such cases, recent evaluation trials performed by US-EPA on chlorine-based determination and on immunoassay methods indicate that the second is more appropriate for performing the screening analysis for PCBs content in oil.

5.6 LABORATORY ANALYSIS OF PCBS

It is possible to detect and quantify all the different PCB congeners in a mixture by using the following analytical method EN 12766 part 3, or the US EPA 1668 and the modified 1668A .These methods are recommended whenever there is the need to quantify specific PCB congeners, like dioxins.

In compliance with the Stockholm Convention requirements, another analytical method which is suitable is - US EPA 8082, if the Aroclor number of the PCBs oil to be analyzed is known. This method will provide the overall amount of PCBs in oil.

While selecting the analytical method, it is important to verify the capability of the analytical laboratory for performing the specific method. Under GLP (Good Laboratory Practice), it is recommended to establish a ring test inter-calibration exercise among the participating labs to verify that the results obtained from different labs are comparable.

6. LABELING, TRACKING AND RECORD KEEPING OF PCBS CONTAINING EQUIPMENT AND WASTES

6.1 **BASICS OF LABELLING**

The objective of Labeling is to *inform* about the possible risk, *prevent* the outcome of an accident or PCBs release and *track* the status and position of the PCBs equipment. And the purpose of placing a label on the PCBs containing equipment is to facilitate the identification of PCBs containing equipment properties which are not immediately evident from the observation of the equipment itself. A label with a Serial Number and a Database ensures traceability.

The purpose of labeling is:

- 1. To know if the PCBs containing equipment is still being used in a factory;
- 2. To ensure that the operators and general public are informed (including, emergency operators during an accident) about the existence of PCBs containing equipment in their factory, so that they can adopt suitable management measures as required;

3. To track the status (put offline or disposed) and movement (within or from the factory) of PCBs labeled equipment.

Labeling and tracking are therefore strictly interrelated activities.

Constantly updating the Centralized Database based on the labeled equipment, clearly assigning the responsibilities in distributing and serializing labels, updating inventories and monitoring the labeled objects ensures "traceability" of the PCBs containing equipment. Labeling and tracking of PCBs containing equipment would be based on the rationale listed in Table 5:

TABLE 5: RATIONALE FOR PCBS LABELING AND TRACKING				
SL No.	PARAMETERS	REQUIREMENTS	DESCRIPTIONS	
1.	Target Identification	Intended addressee of PCBs labels	Organizations	
			Operators.	
			General Public.	
2.		Establish Labeling standards	Establishment of Labeling standards is done considering International standards like GHS (The Globally Harmonized System for Hazard Communication) norms.	
		Responsibilities Authority to control compliance with Labeling standards and obligation	Enforcement of PCBs labeling by Local authorities.	
	Responsibilities		a. State and Central Pollution Control Board (CPCB) and regional offices.	
			b. Ministry of Environment, Forests & Climatic Change (MOEFCC)	
			c. PCB owners and industries	
	Regulatory Implication		Allowed uses of the	Subjected to restriction to sell, buy, dismantle, export PCBs labeled equipment
3.		PCBs labeled equipment	Subjected to obligation to inform authorities about change of status, movement outside or inside the factory, maintenance, etc.	
		Criteria to establish if a particular object needs to be labeled or not	Clear rules to be established for labeling of equipment "possibly" contaminated by PCBs, since it is not possible to analyze all the equipment possibly contaminated by PCBs in a short time	
4.	Information	Information to be printed on the label	Decided in accordance with the target needs, International standards and technical features of the tracing system.	

5.	Printing and Distribution	Printing and Distribution of labels	Production of PCBs labels by PCB owners or a 'label factory'.
			Labels must be more durable than the labeled equipment themselves.
			Establishment of a system for the distribution of Univocal Serial number for PCB labels.
	Database	Building and maintaining a database for the PCBs labeled equipment.	Establishment of a bi-univocal relationship between the PCBs labeled equipment and the Database.
6.			Maintaining the Database at the local as well as the national level.
			Assignment of proper resources.
	Enforcement	prcement Enforcement of the labeling system.	To define a clear system of sanctions and incentives.
			To assign responsibilities.
7.			To inspect the following:
			a. Labeling of PCBs equipment in due time.
			b. Compliance of PCBs label with labeling standards.
			c. Management of the PCBs labeled equipment with respect to the rules and requirements.

Further details on the requirements are given below.

6.2: LABELING OF PCBS CONTAINING EQUIPMENT

6.2.1 TARGET IDENTIFICATION

- Labels must include information about the person in-charge of emergency response. This would help in adopting correct countermeasures in case of an accident (fire, leakage, etc.).
- Labels must include information about the person in-charge of handling, transporting and disposing PCB waste. This would help in reducing further risk to the environment by adopting suitable technical rules for handling, transporting and disposing of waste.
- Labels must inform the general public that the labeled equipment / waste may present some danger to health and also to the environment.
- Labels must contain contact reference (names, telephone numbers) for emergency and normal operation of PCB equipment.
- Labels should contain univocal reference numbers / codes for the control authorities.

6.2.2 CLEAR ASSIGNMENT OF RESPONSIBILITIES

As Party of the Stockholm Convention, the Government of India is in-charge of identifying, labeling and removing PCBs from use and MoEFCC (Ministry of Environment, Forests and Climate Change) is the GEF focal point for the Stockholm Convention on POPs, and is therefore in-charge of drafting the bills concerning the management of PCBs (including inventory, labeling, disposing), and enforcing the legislation once issued. The following should be considered while arranging the inventory and labeling tasks:

- 1. The Pollution Control Board of each state in India should be in-charge of coordinating the identification of PCBs in its territory. The Central Pollution Control Board should co-ordinate with the State Pollution Control Board (SPCB) to provide them with technical guidance and standards, and to collect and store at central level the information gathered at the State level.
- 2. The Ministry of Environment, Forests and Climate Change (MoEFCC) and the Central Pollution Control Board (CPCB) should:
 - a) Draft and circulate standard methodologies and documents for the identification and analysis of PCBs equipment and waste.
 - b) Design, build and maintain a Web Based PCB database, which would exchange information with the State database of PCB inventory.
 - c) Elaborate the standards for the labeling of PCBs equipment.
 - d) Provide technical assistance to the State Pollution Control Board (SPCB) on the PCBs identification and labeling issues
 - e) Provide training to the SPCB on PCBs inventory and labeling issues.

For the above purposes, a permanent organization should be established at the Central Pollution Control Board.

- 3. The State Pollution Control Boards or the regional offices should perform the tasks listed below:
 - a) List the industries and economic activities who are more likely to be users or owners of PCBs equipment
 - b) Identify the contact point of each industry / company by coordinating with the relevant State Chamber of Commerce or equivalent organization;
 - c) Perform awareness training and dissemination;
 - d) Perform questionnaire survey by sending appropriate forms to the industries;
 - e) Confirm doubtful results by telephone call, site visits, sampling and analysis;
 - f) Distribute Univocal label serial numbers to the owner of PCBs contaminated equipment for the labeling of PCBs containing equipment;
 - g) Store information on PCBs equipment on a Web-based PCBs inventory database.
- 4. PCB owners and industries should:
 - a) Fill the PCB inventory forms in the correct format with the information required, by using hardcopies or electronic forms provided by SPCB;
 - b) Label PCBs equipment with standard labels with the serial number provided by the SPCB, in compliance with the rules established for the PCBs inventory and labeling system;
 - c) Adopt any safety measure prescribed by the State Pollution Control Board;

- d) Report on any variation concerning the PCBs equipment listed (for instance, decontamination, maintenance, transportation to another site, transportation for disposal etc.,) to the local authority in-charge of updating the PCBs database;
- e) Comply with the requirement established by the India Hazardous Waste Rules, 2008 with special reference to the handling and transportation of PCBs containing waste.

6.2.3 REGULATORY IMPLICATION OF LABELING

A list of proposed rules for the management of PCB labeled equipment is proposed below:

- 1. Labels would have the legal meaning of a certificate issued by the local or central authority on the basis of the information provided by the owner of the equipment.
- 2. In general, following different PCBs labels would be used:
- a. "<u>Hazardous PCBs containing equipment</u>" Label: Serialized and to be placed on the equipment which is certainly contaminated by PCBs over 2 ppm.
- b. "<u>Toxic PCBs containing equipment</u>" label: Serialized and to be placed on the equipment which is certainly contaminated by PCBs over 2ppm;
- c. "<u>Mildly Toxic PCBs containing equipment</u>" label: Serialized and to be placed on the equipment which is certainly contaminated by PCBs over 2 ppm but less than 50 ppm;
- d. **"Equipment potentially contaminated by PCBs**" label: Serialized and to be placed on the equipment which, based on available information, is probably contaminated by PCBs over 50 ppm;
- e. "<u>PCB Free</u>" label: NOT serialized as traceability is not necessary for non PCBs equipment and to be placed on the equipment which after analysis has been found to be free from PCBs contamination (less than 2 ppm).
- 3. Once identified as PCBs or PCBs suspected, the equipment must be labeled without delay.
- 4. After sampling and analysis, if it is found that the PCBs concentration of labeled PCBs equipment is below 2 ppm, the authority must be provided with a copy of the analytical certificate, and the PCBs label can be removed and replaced with a "PCB free" label.
- 5. After sampling and analysis, if the measured PCBs concentration of suspected PCBs equipment is found to be above 2 ppm, the authority must be provided with the analytical certificate, and the equipment must be labeled with a "PCBs containing equipment" label as indicated above.
- 6. Equipment labeled as "Equipment potentially contaminated by PCBs" should be subjected to sampling and analysis for PCBs content within a set deadline.
- 7. Each label serial number will be associated to a unique PCBs containing equipment; hence each PCB containing equipment will be identified by its specific label serial number. If, due to the equipment size, more labels are necessary for labeling a PCBs containing equipment, these labels will have the same serial number.
- 8. Instructions printed on the label are mandatory and must be fulfilled by the person in-charge.
- 9. Labels cannot be removed, deteriorated, hidden or replaced with other labels. In case labels are lost, deteriorated or destroyed by accidental causes, they must be replaced without delay.

6.2.4 INFORMATION TO BE PRINTED ON THE LABEL

The UN Global Harmonized System (GHS) for substance classification and labeling and packaging should be adopted as reference standard.

Substance Identification	Name: Polychlorinated Biphenyls; PCB	CE Number: 215-648-1 CAS Number: 1336-36-3
Hazard classification and category codes:	STOT RE 2*	May cause damage to respiratory system through prolonged or repeated exposure.
	Aquatic Acute Aquatic Chronic	Hazardous to the aquatic environment, chronic and acute.
Hazard statement (code)	H373**	May cause damage to respiratory system through prolonged or repeated exposure.
	H400	Very toxic to aquatic life.
	H410	Very toxic to aquatic life with long lasting effect.
Pictogram and sign warning codes	GHS08	
	GHS09	
	Wng	
Hazard statement (code)	H373**	May cause damage to respiratory system through prolonged or repeated exposure.
	H410	Very toxic to aquatic life with long lasting effect.
Specific Conc. Limit	STOT RE 2 H373: ≥0.005 %	
Note	С	Supplier must state on label if the substance is a specific isomer or a mixture of isomers

- 1. Label of PCBs containing equipment should clearly indicate the following information, or equivalent:
- a) The word "Warning" followed by "This equipment contains PCBs (Polychlorinated Biphenyls).
- b) The serial number and the barcode of the serial number, if feasible.
- c) Labeling date.
- d) Last Maintenance date of the Equipment.
- e) Information on the type of hazard and health effects, with respect to UN classification and labeling.
- f) A sentence reminding that "It is severely forbidden to open this equipment. If it is necessary to open, move, replace or maintain this equipment, call the person in-charge at the number "xxxxxxxx".
- g) A phone number to be called in case of leakage, fire or any other emergencies.
- 2. On the basis of the above indication, a possible example for a PCB label is reported below



6.2.5 PRINTING, DISTRIBUTING AND PLACING LABELS

Once the equipment has been identified as containing PCBs, the owner of the equipment shall without delay contact the relevant authority for a PCBs serial number for each PCBs containing equipment

After receiving an application for one or more PCBs serial number, the authority shall send without delay to the owner of PCBs equipment, by fax or by mail, a list of PCBs serial number label and the specification for the PCBs label.

A temporary label could be used until the final label is ready.

After receiving the relevant serial numbers from the authority, the owners of PCBs containing equipment shall place the labels in a prominent position on the exterior of a PCBs containing equipment so that it can be easily read.

The design criteria for labels are: high visibility (for instance, a black text over a yellow background); high durability of the material as well as the printed text (both must last at least as long as the equipment itself, even if exposed to the rain and sun) and proper size.

With reference to the label sample provided above, a suggested size for the label could be in the order of 150x150 mm, with reference to USA and Canadian standards.

6.2.6 BUILDING AND MAINTAINING THE DATABASE

Each label must be associated with a record in the centralized database owned and managed by the relevant authorities to ensure traceability. Two levels can be contemplated: databases at the State level and National level database containing all the databases provided by the States.

The database shall have the same structure as that of the PCBs Inventory form.

6.2.7 ENFORCEMENT

A suitable supervision plan shall follow the implementation of the labeling system. Supervision shall be performed at 2 levels:

- 1. **Supervision carried out by a Central authority on the activities of Provincial authority:** The objective is to ensure that the system implemented by the Provincial authority is in place, and is in compliance with the technical specification and the national legislation.
- 2. Supervision carried out by a Local authority on the activities of the PCB owners: The objective is to ensure that a) the equipment that must be labeled has actually been labeled; b) conformity between the information reported on the labels and the properties of the labeled equipment and c) the labeled equipment is used as indicated in the regulation requirements.

6.3 LABELING OF PCB CONTAMINATED AREAS (SIGNALING)

The main objective of signaling to the contaminated areas is to prevent people from being exposed to the contaminant present in the area and also to mark the PCB storage area or PCB contaminated area for future reference. In case of contaminated areas, traceability is not required. But the PCB waste generated from the contaminated area should be traceable. Moreover, PCB contaminated areas should be inventoried, possibly by using a Centralized or a Web based Database. In case these sites are not permanently attended, signals and fences must be maintained and inspected at regular intervals.

Signals should clearly indicate:

- strict prohibition to enter the site
- nature of the hazard (PCB)
- number to be called in case of emergency or accident
- The univocal area code. A tentative example for a warning signal is shown below.



7 ANNEX 1. NIC-2008 CLASSIFICATION OF INDUSTRIES

- Section A: Agriculture, Forestry and Fishing
- Section B: Mining and Quarrying
- Section C: Manufacturing
- Section D: Electricity, gas, steam and air conditioning supply.
- Section E: Water supply; sewerage, waste management and remediation activities
- Section F: Construction
- Section G: Wholesale and retail trade; repair of motor vehicles and motorcycles
- Section H: Transportation and storage
- Section I: Accommodation and Food service activities
- Section J: Information and communication
- Section K: Financial and insurance activities
- Section L: Real estate activities.
- Section M: Professional, scientific and technical activities.
- Section N: Administrative and support service activities
- Section O: Public administration and defence; compulsory social security
- Section P: Education
- Section Q: Human health and social work activities
- Section R: Arts, entertainment and recreation
- Section S: Other service activities

Section T: Activities of households as employers; undifferentiated goods - and services producing activities of households for own use.

Section U: Activities of extra-territorial organizations and bodies.



Central Power Research Institute Dielectric Materials Division Additional Director & Head, PB No. 8066, Sir C.V. Raman Road, Bangalore–560 080 Ph No.: 080 – 2360 0412, 080 – 2360 3527, Email: thomas@cpri.in, pcbgroup@cpri.in