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January 15, 2001

(Hand Delivered January 16, 2001)

One Hundred and Twentieth Legislature
Committee on Natural Resources
115 State House Station
Augusta, Maine 04333-0115

**RE: BANGOR HYDRO ELECTRIC COMPANY – PROGRESS REPORT ON
THE REDUCTION OF TRANSFORMERS CONTAINING 50 PPM OR
GREATER PCB**

Members of the Committee on Natural Resources:

38 MRSA Section 419-B, Goals for Dates of Removal of Transformers Containing Polychlorinated Biphenyls requires that public utilities submit a progress report on the removal of PCB containing (50 ppm PCB or greater) transformers by January 15, 2001. Please consider this letter as Bangor Hydro's progress report as required by 38 MRSA Section 419-B. Bangor Hydro last reported information regarding PCBs to the Committee on Natural Resources (Committee) by letter dated March 9, 1999.

The goals established by 38 MRSA Section 419-B are (1) the removal of PCB containing transformers within 100 feet of surface waters or schools by October 1, 2005, and (2) the removal of all remaining PCB containing transformers by October 1, 2011. Specifically, the progress report should address the utility's progress toward the removal of PCB containing transformers located within 100 feet of surface waters and schools, and a plan to address the removal of PCB containing transformers located in underground vaults.

Bangor Hydro's progress on the removal of PCB Containing transformers is highlighted by the following, which will be discussed in detail:

- ◆ The continuance of a historical, aggressive removal and disposal program for PCB containing transformers from all areas.
- ◆ The development of a Project Layout plan that focuses on steps that Bangor Hydro plans on taking to meet the 2005, and 2011 removal goals.

- ◆ The completion of a survey of underground transformers, and establishment of a plan to complete the removal of underground, PCB containing transformers by October 1, 2002.

Continuance of Historical Removal and Disposal Program

Since the late 1980's Bangor Hydro has been aggressively removing from service and disposing of transformers that may contain PCBs. A majority of this disposal program is done on a voluntary basis. Because of our aggressive approach to disposal, Bangor Hydro reported to the Committee on March 9, 1999, that we own approximately 8,322 transformers manufactured before 1980. These transformers potentially contain PCBs 50 ppm or greater in concentration. Bangor Hydro's disposal program has continued and it is now estimated that we own approximately 7,310 distribution transformers that may contain PCBs 50 ppm or greater, a 1,012 unit reduction since March 9, 1999.

As previously explained to the Committee, based on vast amounts of oil sampling data, only eleven percent of Bangor Hydro's 7,310 remaining transformers (suspect to contain PCBs), will actually contain PCBs greater than 50 ppm. Of the remaining 7,310 suspect transformers, then, we would expect approximately 804 to contain PCBs 50 ppm or greater in concentration.

Project Planning for Voluntary Removal Goals

The October 1, 2005 removal goal targets transformers containing PCBs 50 ppm or greater, that are within 100 feet of surface waters and schools (the "target" group of transformers). Certainly, some of the 1,012 transformers removed since March 9, 1999 have come from these priority areas. Bangor Hydro lacked, however, a comprehensive plan that would identify the number and location of target group transformers, and a removal tracking system. Therefore, much of the work conducted thus far to address the removal goal of October 1, 2005 has been related to development of the attached Project Layout. The Project Layout plan identifies the number of target transformers whose PCB concentration needs to be determined. The location of these transformers has been determined from Bangor Hydro's Geographic Information System data.

In summary, the total number of transformers identified near surface water or schools is 3,934. Data needs to be collected from these transformers to determine if they are non-PCB, based on manufacturer nameplate information or testing records, or, if the transformer is suspect for containing PCBs. Only a subset of the 3,934 transformers will be at risk for containing PCBs, as many will be certified by the manufacturer or testing to be non-PCB. PCB data collection from the target group of transformers is scheduled to be conducted during 2001.

For all target group transformers not known to be non-PCB, Bangor Hydro will determine, using transformer nameplate data, historical sampling records, and other available utility sampling records, the risk of a particular transformer to contain PCBs in concentrations of 50 ppm or greater. Target group transformers will then be prioritized

for removal through October 1, 2005, based on the PCB risks associated with the transformer. The intent is to remove target transformers with the highest statistical risk of containing PCBs on a priority basis.

Plan for Removal of Underground Transformers

In the March 9, 1999 report to the Committee, Bangor Hydro reported that we had nine transformers that may contain PCBs at concentrations of 50 ppm or greater remaining in the Bangor underground system. Since that time, two suspect units have been removed and replaced with non-PCB transformers. During the year 2000, Bangor Hydro surveyed all underground transformers in order to identify the seven transformers remaining that are suspect to containing PCBs. Bangor Hydro plans on testing and removing, as necessary, any of the seven remaining underground transformers that contain PCBs at concentrations of 50 ppm or greater by October 1, 2002.

If you have any questions or require additional information, I can be reached at 207-990-6983.

Sincerely,



Fred W. Leigh
Director of Environmental
Services and Compliance

Enclosures

CC: Susan Hawkes, Hawkes Associates
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