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

Bangor Hydro
ELECTRIC COMPANY

January 15, 2009

Senator Seth A. Goodall
One Hundred and Twenty-Fourth Legislature
Committee on Natural Resources
3 State House Station
Augusta, Maine 04333-0100

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

Senator Goodall, Representative Duchesne, and 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, 2009. 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 January 22, 2007.

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 (target transformers) 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 and address the number of PCB containing transformers remaining in service.

Bangor Hydro's progress on the removal of PCB containing transformers is highlighted by the following:

- The continuance of a historical, aggressive removal and disposal program for PCB containing transformers from all areas.

- Continuation of a transformer labeling program to easily identify transformers that have been determined to contain PCB's less than 50 ppm.

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- Development of and training on a nameplate data collection tool for tracking nameplate data collected.

- Updates of Bangor Hydro's "Transformer Management Program for Voluntary Compliance with 38 MRSA 419-B – Voluntary Removal of PCB-Containing Transformers".

- Completion of target transformer nameplate PCB data collection and evaluation for PCB risk of approximately 4,000 transformers in all of our divisions service territories.

- Subsequent oil sampling of PCB high risk transformers to verify transformers > 50 ppm PCBs.

- The removal of all target transformers identified to date (157 transformers from Goal 1 of 38 MRSA Section 419B & 136 from Goal 2) as containing > 50 ppm PCBs.

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. Bangor Hydro's disposal program has continued and it is estimated that since March 9, 1999, we have removed 4,830 units (including transformers specifically removed as part of this program) manufactured before 1980. These transformers potentially contain PCBs 50 ppm or greater in concentration.

Project Planning for Voluntary Removal Goals

The October 1, 2005, goal of identifying and removing transformers containing PCBs >50 ppm that are within 100 feet of surface waters and schools has been completed. We identified 3,934 transformers with unidentified PCB concentrations near surface waters and schools which were inspected and only 157 of these were determined to be high risk for containing PCBs > 50 ppm and were subsequently removed.

Over the past two years, Bangor Hydro has collected and evaluated nameplate data from approximately 4,000 transformers identified through our GIS system as having unknown PCB concentrations. As the data from the transformers was collected, it was determined if the transformer was considered non-PCB based on manufacturer nameplate information or testing records, or whether the transformer was considered to be a low or high risk for containing PCB's based on statistical data. Any transformers determined to be high risk were then sampled to determine actual PCB concentration. If the transformer contained > 50 ppm PCBs, it was then removed from service. Only a small subset (136) of the approximately 4,000 transformers were identified as containing > 50 ppm PCBs.

All transformers identified as containing > 50 ppm PCBs (136) were then removed from our system.

Bangor Hydro estimates from inventory records that we currently have approximately 6,200 transformers which were purchased pre-1980 and, therefore, may contain PCBs. Bangor Hydro has made a reasonable assumption that most of these older transformers are located on poles older than 1980. At this time, we have approximately 14,000 more transformers on poles pre-1980 to inspect Based on Bangor Hydro system knowledge, we will also inspect all transformers on new poles for some high risk areas. Based on current data, we estimate that we have somewhere between 500-700 transformers left in our system which contain > 50 ppm PCBs.

If you have any questions or require additional information, I can be reached at 207-973-2542.

Sincerely,

Mona E. Spear

Mona E. Spear
Supervisor of Environmental Compliance

Enclosures

CC: Bob Hanf, Bangor Hydro
Gerry Chasse, Bangor Hydro
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Dan McCarthy, Bangor Hydro
Bob Platt, Bangor Hydro
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Mary Smith, CMP

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