Q. Re 2011 PCB Removal Strategy - on page 8 of Tab 2.3 reference is made to a letter dated May 11, 2010 from the CEA to Environment Canada. Please provide a copy of this letter.

A. The reference to a CEA letter of May 11, 2010 in the *2011 PCB Removal Strategy* is an error. CEA sent a submission to Environment Canada on this topic on November 13th, 2009.

A copy of CEA's letter of November 13th, 2009 is included as Attachment A.

Letter from Canadian Electricity Association
dated November 13, 2009

Canadian Electricity Association | Association canadienne de l'électricité

Mr. Robert Larocque
Chief Waste Programs
Waste Reduction and Management
Environment Canada
351 BLVD St-Joseph, 14th floor
Gatineau, QC, K1A0H3

November 13, 2009

Re: PCB Equipment Inventory Update to Support Amendment Requirement

Dear Mr. Larocque,

As you are well aware, the electricity sector and Environment Canada have been working diligently together towards a feasible solution to virtually eliminate PCBs from electrical equipment in Canada. The electricity sector applauds Environment Canada's efforts to address this potentially harmful substance and appreciates the opportunity to provide input on this important issue.

The current PCB Regulations require all equipment greater than 500 mg/kg PCB be removed from service by December 31, 2009, with the exception of pole-top electrical transformers and light ballasts, which are exempt until 2025. The option to extend this deadline until 2014 is also provided by the regulations.

Although most companies have applied for this extension (or are in the process of applying), most feel that this extended deadline is too ambitious to test and remove all impacted substation equipment. This is because several pieces of equipment used by the electricity sector have unknown PCB concentrations, and this equipment is often sealed and cannot be inspected or tested while energized. Outages must be scheduled to inspect, test or replace this equipment. These outages must be scheduled in a manner that does not put the reliability, safety and security of the electrical system at risk.

As such, the electricity sector is seeking an amendment to the current PCB regulations which would allow the use of smaller equipment, such as bushings and Instrument Transformers (IT), in substations until 2025 as was originally allowed in the Canada Gazette Part 1 publication (section 18(c) – "A person may continue to use, until December 31, 2025 … current transformers, potential transformers, circuit breakers, reclosers and bushings that are located at an electrical generation, transmission or distribution facility."). As was discussed during our meeting with Cynthia Wright and Randall Meades, an updated PCB equipment inventory (attached) has been provided in support of this request.

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This inventory summary provides an overview of the PCB equipment inventory across Canada. Although, the summary does not include inventory from every generator, transmitter or distributor in Canada, it does include inventories from several vertically integrated companies providing a good representation of equipment across the country.

Of the equipment surveyed, approximately 50 percent of bushings and 40 percent of ITs have PCB concentrations that are unknown. As is the case with pole-top transformers and light ballasts, the precise location of equipment that contains greater than 500 mg/kg PCB is also unknown. While the survey data demonstrates that the majority of the known equipment falls below 50 mg/kg PCB concentration, and that only 1 percent of equipment surveyed is above 500 mg/kg PCB, equipment with unknown concentrations must be inspected and tested to determine specifically which equipment is over 500 mg/kg PCB in order to be in compliance with the current regulations. This work will not be able to be efficiently completed prior to the end of 2014. Since these pieces of equipment are contained within secured substations and other secured locations, the risks to the environment and to public health and safety are minimal.

The electricity sector is committed to be a part of the action plan to virtually eliminate PCBs from electrical equipment in Canada. However, given the limitations described above, the electricity sector cannot be in full compliance with the regulations as written. It is imperative that companies have the time to ensure that all PCB equipment is managed appropriately and in an economically feasible manner. An amendment to the PCB regulation to allow bushings and ITs to be managed in the same fashion as pole-top electrical transformers and light ballasts would allow companies to achieve their elimination goals while maintaining compliance with the regulation.

Thank you for the opportunity to participate in this initiative as the outcome is very important to our sector. Please do not hesitate to contact me should you have any questions or concerns. I will be following up with you to discuss next steps. Thank you.

Regards,

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cc.

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Randall Meades - Director General, Environment Canada
Caroline Blain – Director, Waste Reduction and Management, Environment Canada