

Federal Regulations

The federal environmental regulation that most affects dielectric fluids is the Spill Prevention, Control and Countermeasure (SPCC) regulation. The following addresses some of the key applicability points and the affect of the regulations on oil filled electrical devices.

1. Applicability of the SPCC Regulations

- A Facility with an oil storage capacity > 1,320 gallons where a spill of the oil would reasonably be expected to reach navigable waters must have a P.E prepare a SPCC plan.
 - Man made structures that would slow down a spill is discounted.
 - Oil filled electrical equipment is considered storage.
 - Right now, "oil" includes petroleum and seed-based (edible) oils.
 - Containers with a storage capacity < 55 gallons are not included in the 1,320 number or any of the SPCC requirements. The core/coil assembly would reduce the volume number.
- Facility can be fixed or mobile, onshore or offshore.
- "Navigable waters" is a complex term defined by regulations and court cases. Some of the key points are:
 - All waters used currently or in the past for interstate or foreign commerce, recreational or other uses.
 - An EPA SPCC guide web site lists examples of waters they consider as "navigable water": Interstate and intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds. Whether or not all these examples would pass the muster of a legal challenge is not known, as we have not seen this listing included in the actual legislation. Let the customer determine if something is navigable water.

2. How the SPCC regulations affect oil filled electrical equipment

- Since oil filled electrical equipment it is not considered a bulk oil storage container, the diked secondary containment requirements of 112.8 (c) are not required.
- However, the "general duty" portion of the regulations under 112.7 (c) do require oil filled electrical equipment to have appropriate containment and/or diversionary structures to prevent a discharge to navigable waters. Examples of this include: secondary containment described above, earthen or natural structures such as a berm, a long stretch of grass, small stones, etc. if they prevent discharges to a navigable water. If 100% of the fluid is spilled and any of the fluid reached the water, the containment would not be deemed sufficient.
- Under the SPCC, when there is an oil spill involving a site requiring compliance, there are three main activities: Spill reporting, response time, and remediation. Under the current regulations, vegetable oils must have the same requirements for the first two activities. Remediation requirements may be different, determined on a case-by-case basis. The EPA will solicit public comment on whether the general SPCC containment requirements should be modified for small electrical equipment and what should constitute "small" electrical equipment. Cooper Power Systems will be pursuing the EPA for SPCC relief for Envirotemp FR3 fluid and will provide periodic updates.

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Reference Information
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