

**Table 7: OVERVIEW OF PROPOSED CHANGES IN  
TRANSFORMER RECLASSIFICATION RULES**

---

<b><u>Transformer Category</u></b>	<b><u>Changes in proposed rule</u></b>
<b>&lt; 50 ppm</b> <i>non-PCB transformers</i>	<ul style="list-style-type: none"><li>• No change</li></ul>
<b>50 - 500 ppm</b> <i>PCB-contaminated transformers</i>	<ul style="list-style-type: none"><li>• Testing PCB concentration after retrofill eliminated under proposed rules</li><li>• Revised documentation under proposed rules</li></ul>
<b>500 - 1000 ppm</b> <i>PCB transformers</i>	<ul style="list-style-type: none"><li>• Testing time decreased to 21 days from 90 days</li><li>• Temperature testing requirement eliminated</li><li>• PCB concentration requirement lowered to 25 ppm from 50 ppm to reclassify as a non-PCB transformer</li><li>• Revised documentation under proposed rules</li></ul>
<b>&gt; 1000 ppm</b> <i>PCB transformers</i>	<ul style="list-style-type: none"><li>• Temperature testing requirement eliminated</li><li>• Revised documentation under proposed rules.</li></ul>