



Randolph S. Price
Vice President
Environment, Health & Safety

February 28, 2012

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Hon. Jaclyn A. Brillong
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: **PCB Equipment Inventory Report**
PSC Case 29211

Dear Secretary Brillong:

Pursuant to the New York State Public Service Commission (PSC) regulation 16 NYCRR Part 730, PSC Case 29211, Con Edison hereby submits three (3) copies of its PCB Equipment Inventory Report for the period July 1, 2011 through December 31, 2011. A copy of this report has been sent to the chief executive of each county or city located within Con Edison's service territory in which the Company operated, stored, or transported electrical equipment containing oil or other fluid with a concentration of 500 parts-per-million or more of Polychlorinated Biphenyls (PCBs). Copies of the cover letters transmitting the report to local officials are attached.

Please contact Bahi Elmiry at (212) 460-2278, if you have any questions regarding this report.

Very truly yours,


Randolph S. Price

Attachments

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

**REPORT TO THE PUBLIC SERVICE COMMISSION
PCB EQUIPMENT INVENTORY
PSC CASE 29211
JULY 1, 2011 THROUGH DECEMBER 31, 2011**

FEBRUARY 2012

INTRODUCTION

This report constitutes Con Edison's semi-annual electric equipment and gas compressor PCB inventory filing under Section 66(23) of the New York Public Service Law ("PSL"), PSC Case 29211, for the period ending DECEMBER 31, 2011. As specified in the Public Service Commission's regulations (16 NYCRR Part 730) implementing PSL § 66(23), this report is also being submitted to the chief executive officer of each county and city located within Con Edison's service territory in which the Company operated, stored, or transported equipment containing 500 parts per million (ppm) or more of PCBs and is organized as follows:

- Part 1 of the report addresses equipment that contains or is assumed to contain PCBs in concentrations of 500 ppm or more ("PCB Equipment") and that was in-service as of DECEMBER 31, 2011.
- Part 2 of the report addresses PCB Equipment that was retired or disposed of during the period JULY 1, 2011 through DECEMBER 31, 2011 or that was being stored for disposal as of DECEMBER 31, 2011.

It should be noted that this report's inventory listings include only equipment, as defined in 6 NYCRR § 730.1, that contains or is assumed to contain oil or fluids with PCB concentrations of 500 ppm or greater. Con Edison owns and operates oil and fluid-filled equipment and equipment components that are known or assumed to contain PCBs in concentrations of less than 500 ppm. However, the Public Service Law does not require that lists of such equipment be included in semi-annual PCB inventory reports. In addition, this report does not address PCB liquids (gas condensate) discovered in Con Edison's gas distribution system. Under PSL § 66(23) and 6 NYCRR Part 730, these PCB liquids are addressed in a separate report to the Public Service Commission.

USEPA POLICIES

In determining which of its equipment should be included in this report, Con Edison adhered to the regulations (40 CFR 761), policies, and guidance of the U.S. Environmental Protection Agency ("USEPA") pertaining to PCB-containing equipment. These include:

1. Transformer PCB classification status is based on the PCB concentration of the dielectric fluid in the main body of a transformer while the unit is in use or in storage for reuse. Transformer component parts, such as bushings, tap changers, external vacuum braces, and attached bushing potential devices, are considered to have the same PCB concentration as the in-service transformer of which they are component parts unless and until the components are tested separately for PCB. The same considerations and policies apply when determining the PCB classification status of other types of electric equipment, such as switches, circuit breakers, reclosers, voltage

assemblies. Consequently, they can be difficult to access to read nameplate information regarding date of manufacture or type and amount of fluid.

USEPA recognized that in many cases it is not possible to test or inspect *small* transformers without compromising their integrity or creating safety hazards. Therefore, USEPA provided the following guidance with respect to such transformers:

"....For any period during which it is not possible to physically inspect or test a small transformer (as described at 63 FR 35388) without compromising the integrity of the equipment or where such inspection or testing would pose a safety hazard to personnel without an electrical shutdown of the transformer, the owner or operator of the equipment may rely upon the exercise of best engineering judgment to evaluate the regulatory status of the equipment under the criteria set out in § 761.2 (a) (3) (e.g., whether the equipment is dry, non-liquid, contains less than 3 pound of fluid, or contains mineral oil)." (September 2, 1998 letter from Lynn Goldman, USEPA, to Toni Allen, Piper & Marbury, counsel to Utility Solid Waste Activities Group).

Con Edison's Best Engineering Judgment for *small* transformers located in Con Edison's electric substations is based on information from equipment manufacturers, technical and contract specifications, and the experience of Con Edison's substation engineers and operators. This BEJ is that the small transformers at its substations are either dry type transformers or are likely to contain mineral oil rather than concentrated PCB dielectric fluid. Con Edison assumes that small transformers manufactured before July 2, 1979, which have not been tested for PCB content and for which it has no information indicating that the small transformers are filled with concentrated PCB dielectric fluid, are mineral oil-filled units that contain more than 50 ppm but less than 500 ppm of PCBs. In keeping with USEPA's guidance, if Con Edison discovers that a small transformer at its substations (or any other facility) contains Askarel or other concentrated PCB dielectric fluid, it will treat other units of the same style, class, or model number as PCB Transformers.

EXPLANATION OF THE INFORMATION

1. **Capacitors.** Pursuant to PSC Staff guidance, any capacitor inventory listings contained in this report would include only *Large* Capacitors as defined by USEPA regulations (40 CFR 761.3). Under those regulations, a *Large* Capacitor is one that contains, or is assumed to contain 3 pounds or more of dielectric fluid.

Con Edison generally does not inventory separate component parts of its electric equipment because, as noted above, the PCB classification of electric equipment under the USEPA regulations is based on the PCB concentration of the dielectric fluid in the main tank or body of a piece of electric equipment, rather than the PCB concentration of the equipment's various individual component parts. However, Con Edison does maintain on its electric system equipment that contains *Small* Capacitors as defined by the USEPA regulations (capacitors containing less than three pounds of dielectric fluid). Some of these small capacitors are known to contain concentrated PCB dielectric fluid

as public address and telephone communication systems, and solid plasticizer in relay wires. These PCB applications are not inventoried by Con Edison.

4. It is possible for PCBs to leach from the core of a piece of equipment over time to increase the concentration in the dielectric fluid. Consequently, equipment on record to contain less than 500 ppm PCBs could, when re-tested during maintenance or repair, be found to contain more than 500 ppm PCBs and be added to PCB inventories and reports.

5. The retired PCB Equipment presented in this report is based on hazardous waste manifests and other records at Con Edison's Astoria Hazardous Waste Storage Facility. This report does not include electrical equipment where the PCB contamination is incidentally present, such as in paint, residuals from manufacturing process, caulking, ect., and not present in the oil or other fluids necessary for their operation.

6. As previously agreed with the New York State Department of Public Service in March 18, 1999, Con Edison is permitted to report any newly identified PCB equipment in its next semi-annual submission to PSC and is not required to modify this or any other previously-submitted PCB equipment inventory report that it filed with the PSC each time equipment that was assumed to contain less than 500 ppm PCBs is tested and found to contain 500 ppm or more of PCBs. However, Con Edison must file modifications to its inventory reports to correct any mistakes that were made in a previously submitted report and to include any PCB equipment that was identified by Con Edison prior to the filing of a report but not listed in the report.

CHANGES / CORRECTIONS SINCE LAST REPORT

Queens County:

A transformer from our Electric Distribution System located at 31-01 20th Ave, LIC, in Queens, New York was removed from service on May 12, 2011. The oil from the main body of this transformer was sampled and showed a concentration of 611ppm PCB. The unit was shipped to TCI of Alabama, LLC for final disposition on July 21, 2011.

A total of five (5) capacitors were removed from service from this county. Four (4) capacitors from the Astoria Complex located at 31-01 20th Ave, LIC, NY were removed from service on August 23rd, November 8th, 23rd and 29th in 2011 and one (1) capacitor from the Rainey Substation located at 35-58 Vernon Blvd., in LIC New York was removed from service on June 28, 2011. All five (5) capacitors were shipped to Triumvirate Environmental Services on September 1st; August 10th; November 23rd; December 9th and 28th of 2011, respectively. All five (5) capacitors were then subsequently shipped to Chemical Waste Management located in Model City New York for ultimate disposition on August 15th, September 13th, December 12th, 2011 and January 3rd, 2012, respectively.

PART 1

PCB EQUIPMENT IN SERVICE ON DECEMBER 31, 2011

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2011

KINGS COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. GAS COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS: None Reported

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2011

QUEENS COUNTY, NEW YORK

1. TRANSFORMERS: None Reported
2. LARGE CAPACITORS: None Reported
3. GAS COMPRESSORS: None Reported
4. OTHER EQUIPMENT: None Reported
5. ELECTRICAL EQUIPMENT COMPONENTS: None Reported

INVENTORY OF IN-SERVICE PCB EQUIPMENT AS OF DECEMBER 31, 2011

WESTCHESTER COUNTY, NEW YORK

- 1. TRANSFORMERS: None Reported
- 2. LARGE CAPACITORS: None Reported
- 3. GAS COMPRESSORS: None Reported
- 4. OTHER EQUIPMENT: None Reported
- 5. ELECTRICAL EQUIPMENT COMPONENTS:

CATEGORY	LOCATION	EQUIPMENT ID	No.	COOLANT TYPE	APPROX. CAPACITY/ UNIT	PCB CONC (PPM)	SERVICE DATE
Substation	Mohegan (14) Substation, Lexington Ave, Mohegan.	Vacuum Bracing on Transformer Serial # FFP80342	6 individual beams	Drained, formerly contained mineral oil	Drained in May 2001, formerly contained an estimated 10 gallons	515 (sampled 12/18/98) 556 (bracing residue sampled 08/08/11)	Not Available
Substation	Shrub Oak (95) Substation, Barger St s/o of Jefferson Valley Rd., Yorktown.	Vacuum Bracing on Transformer Serial # C01839-5-4	3 levels of interconnected beams	Drained, formerly contained mineral oil	Drained on 8/24/99, formerly contained about 5 gal.	715 (sampled 12/16/98) 871.7 (bracing residue sampled 08/08/11)	Manuf'd 1955

EXHIBIT 1

**Listing of Oil-Filled Rectifiers in New York County that have Small PCB Capacitors and
were not yet removed from this location as of December 31, 2011**



conEdison

Oil Filled Rectifiers Containing Askarel Capacitors

Dec' 2011

CSA	Vault	LOCATION
Manhattan	6249	E 47 St & 3 Av

PART 2

RETIRED PCB EQUIPMENT FOR THE PERIOD:

JULY 1- DECEMBER 31, 2011

RETIRED PCB EQUIPMENT (JULY 1 TO DECEMBER 31, 2011)

BRONX COUNTY

PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Gas Compressors: None

Other Equipment: None

Electrical Equipment Components: None

RETIRED PCB EQUIPMENT (JULY 1 TO DECEMBER 31, 2011)

KINGS COUNTY

1. PCB EQUIPMENT REMOVED FROM SERVICE

Transformers: None

Large Capacitors: None

Gas Compressors: None

Other Equipment: None

Electrical Equipment Components: None

RETIRED PCB EQUIPMENT (JULY 1 TO DECEMBER 31, 2011)

Large Capacitors: Five

Last In - Service Location	Category	Equipment Type and I.D.	No.	Approx. Gross Weight	Coolant Type	PCB Conc. (ppm)	Retire Date	Ship Date to TSDf Triumvirate	Ship Date to TSDf CWM Chemical Services
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	15 Kg	Oil	>500	8/23/11	9/1/11	9/13/11
Last In - Service Location	Category	Equipment Type and I.D.	No.	Approx. Gross Weight	Coolant Type	PCB Conc. (ppm)	Retire Date	Ship Date to TSDf Triumvirate	Ship Date to TSDf CWM Chemical Services
Rainey S/S, 35-58 Vernon Blvd., LIC., NY 11106	Substations	Capacitor/Reservoir	1	50 Kg	Oil	>500	6/28/11	8/10/11	8/15/11
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	25 Kg	Oil	>500	11/23/11	12/9/11	12/12/11
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	100 Kg	Oil	>500	11/29/11	12/28/11	1/3/12
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	25 Kg	Oil	>500	11/08/11	11/23/11	12/12/11

Gas Compressors: None

Other Equipment: None

RETIRED PCB EQUIPMENT (JULY 1 TO DECEMBER 31, 2011)

DISPOSAL FACILITY: Triumvirate Environmental Services LLC, 42-14 19th Ave., Astoria, NY 11105

NEW YORK PORTION OF SHIPPING ROUTE (From Astoria to Triumvirate Env. Services) : Astoria (Queens, NYC) - 20th Ave (Queens)--> 42nd St (Queens) --> 19th Ave (Queens)

Last In-Service Location	Category	Equipment Type and LD.	No.	Approx. Gross Weight ² (kg)	Coolant Type	PCB Conc. (ppm)	Retire Date	Ship Date to Triumvirate	Ship Date to CWM Chemical Services
Rainey S/S, 35-58 Vernon Blvd., LIC., NY 11106	Substations	Capacitor/Reservoir	1	50 Kg	Oil	>500	6/28/11	8/10/11	8/15/11
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	25 Kg	Oil	>500	11/23/11	12/9/11	12/12/11
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	100 Kg	Oil	>500	11/29/11	12/28/11	1/3/12
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	25 Kg	Oil	>500	11/08/11	11/23/11	12/12/11
Consolidated Edison of NY 31-01 20 th Ave, LIC, NY	Astoria Complex	Capacitor/Reservoir	1	15 Kg	Oil	>500	8/23/11	9/1/11	9/13/11

² Weight is given in kilograms (kg) to be consistent with manifest information. For a particular piece of equipment, the weight reported herein is the weight specified on the manifest to the final (non-Con Edison) treatment/storage/disposal facility

RETIRED PCB EQUIPMENT (JULY 1 TO DECEMBER 31, 2011)

Transformers: None

Large Capacitors: None

Gas Compressors: None

Other Equipment: None

Electrical Equipment Components: None