

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

T. Ulawickie



Robert F. Flacke
Commissioner

June 5, 1981

General Electric Company
Laminated and Insulating Materials
Business Department
One Campbell Road
Schenectady, New York 12345

Attention: J. S. Shane
Manager, Environmental and
Safety Programs

Gentlemen:

Re: General Electric Petition for
Declaratory Ruling; application
of 6 NYCRR Part 228 to impregnation
of dielectric-barrier substrate
materials DEC 19-02

The Insulating Materials Product Section of General Electric Company at Schenectady, New York requests a Declaratory Ruling under 6 NYCRR Part 619 that an impregnation of dielectric-barrier substrate materials process is not a surface coating process subject to the requirements of 6 NYCRR Part 228. The General Counsel of the Department of Environmental Conservation has determined, based upon review of the regulations and the process described in General Electric's Petition, that Part 228 in its present form does not apply.

Limitations of only one operation listed in the "Process, emission source, and description of products" Table, 6 NYCRR 228.6: "magnet wire insulation coating lines" might be construed to be applicable to the impregnation of dielectric-barrier substrates. The description of products, however, intended to be subject to the limitations of that operation include enamel and varnish as surface coatings on wires to create an electromagnetic field. Petitioner's process does not involve surface coating. The dielectric material is formed by impregnating a dielectric substrate with resin which insulating matter is then wrapped around wire or other material.

Petitioner, of course, remains subject to the requirements of 6 NYCRR Part 212.

Sincerely,



Richard A. Persico
General Counsel/Deputy Commissioner