

# FR3<sup>®</sup> fluid: Acceptable delivery specifications

Electrical Apparatus  
**R2000**

## DESCRIPTION

Cargill FR3<sup>®</sup> fluid is a renewable, biobased natural ester dielectric coolant for use in distribution and power class transformers where its unique fire safety, environmental, electrical, and chemical properties are advantageous. Acceptance limits for new fluid are shown in Table 1. More than 20 years of field experience - with more than two million FR3 fluid filled transformers in service - confirms excellent performance.

FR3 fluid is formulated from seed oils and performance enhancing additives. It does not contain petroleum, halogens, silicones or corrosive sulfur. It quickly and thoroughly biodegrades<sup>1</sup> in the environment. The fluid is non-toxic in acute aquatic<sup>2</sup> and oral toxicity tests<sup>3</sup>. The Color Green tint reflects its favorable environmental profile (See Table 2) and readily distinguishes it from petroleum based oils.

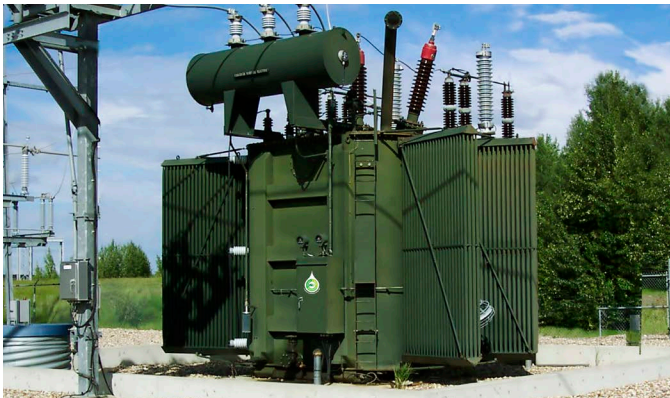
FR3 fluid has exceptionally high flash/fire points of approximately 330/360 °C - the highest ignition resistance of any high fire point dielectric fluid currently available. It qualifies as a “high-fire-point,” “less-flammable,” “IEC Class K,”

and “non-propagating” fluid. FR3 fluid is Approved<sup>4</sup> by FM Global and Classified<sup>5</sup> by Underwriters Laboratories as a Less-Flammable Dielectric Liquid for use in complying with the National Electric Code<sup>6</sup> (NEC) and insurance listing requirements<sup>7</sup>.

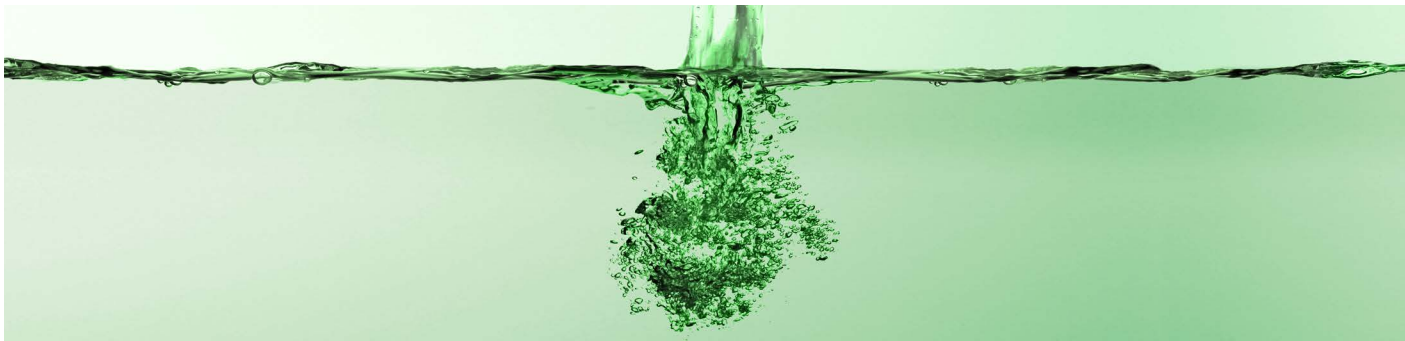
FR3 fluid is compatible with standard transformer construction materials and components. FR3 fluid should be stored, handled, and processed in a similar meticulous manner as transformer mineral oil. See Cargill’s FR3 Fluid Storage and Handling Guide, S10, for additional information.

A transformer filled with FR3 fluid complies with the transformer temperature operating range requirements defined in IEEE C57.12.00 and IEC 60076-2.

In addition to new distribution and power class transformers, a variety of other equipment, including voltage regulators, sectionalizing switches, transformer rectifiers, and electromagnets use FR3 fluid. The fluid is also used in retrofill applications for transformers and other fluid-filled distribution and power equipment.



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## Acceptable limits for receipt of shipments of Cargill FR3 fluid

**Table 1**  
FR3 fluid Acceptance Limits

PROPERTY	Standard test methods		ASTM D6871/IEEC C57.147	IEC 62770	FR3 fluid	
	ASTM	ISO/IEC	As-received new fluid property requirements	Unused new fluid property requirements	TYPICAL	
<b>Physical</b>						
Color	D1500	ISO 2211	≤1.0	–	0.5	
Flash Point PMCC (°C)	D93	ISO 2719	–	≥250	260-270	
Flash Point COC (°C)	D92	ISO 2592	≥275	–	320-330	
Fire Point (°C)	D92	ISO 2592	≥300	>300	350-360	
Pour Point (°C)	D97	ISO 3016	<-10	≤-10	-18 to -21	
Density at 20°C (g/cm <sup>3</sup> )	–	ISO 3675	–	≤1.0	0.92	
Relative Density (Specific Gravity) 15°C	D1298	–	≤0.96	–	0.92	
Viscosity (mm <sup>2</sup> /sec)						
	100°C	D445	ISO 3104	≤15	≤15	7.7 - 8.3
	40°C			≤50	≤50	32 - 34
	0°C			≤500	–	190
	-20°C			–	–	650*
Visual Examination	D1524	IEC 62770 4.2.1	bright and clear	clear, free from sediment and suspended matter	clear, light green	
Biodegradation	OECD 301B		readily biodegradable	readily biodegradable	readily biodegradable	
Aquatic and Oral Acute Toxicity	OECD 202, 203, OECD 420		non-toxic	non-toxic	non-toxic	
<b>Electrical</b>						
Dielectric Breakdown (kV)	D877	–	≥30	–	>45	
Dielectric Breakdown (kV)						
	1 mm gap	D1816	–	≥20	–	>25
	2 mm gap	D1816	–	≥35	–	>50
	2.5 mm gap	–	IEC 60156	–	≥35	>55
Dielectric Breakdown under Impulse (kV)						
	25.4 mm gap	D3300	–	>130	–	140
Gassing Tendency (μl/min)	D2300	–	≤0	–	-79	
Dissipation Factor						
	25°C (%)	D924	–	≤0.20	–	0.010 - 0.15
	90°C (tan δ)	–	IEC 60247	–	≤0.05	0.01 - 0.03
	100°C (%)	D924	–	≤4.0	–	1.00 - 3.85
<b>Chemical</b>						
Corrosive Sulfur	D1275	IEC 62697	non-corrosive	non-corrosive	non-corrosive	
Water Content (mg/kg)	D1533	IEC 60814	≤200	≤200	4 - 50	
Acid Number (mg KOH/g)	D974	IEC 62021.3	≤0.06	≤0.06	0.01 - 0.05	
PCB Content (mg/kg)	D4059	IEC 61619	not detectable	free from PCBs	not detectable	
Total Additives	–	IEC 60666	–	Max weight fraction 5%	<2%	
Oxidation Stability (48 hrs, 120°C)	–	IEC 61125 IEC 62770	–	–	–	
	Total Acidity (mg KOH/g)	–	IEC 62621.3	–	≤0.6	0.1 - 0.3
	Viscosity at 40°C (mm <sup>2</sup> /sec)	–	ISO 3104	–	≤30% increase over initial	17% - 23% increase
	Dissipation Factor at 90°C (tan δ)	–	IEC 60247	–	≤0.5	0.1
Oxidation Induction Time 130°C/500psi (min)	D6186**	–	–	–	62±2 min	

\* Measurement of viscosity near pour point may be inaccurate.

\*\* A more specific version of the test indicated by ASTM D6186 is under development.

**NOTE:** Specifications should be written referencing only the defined ASTM or IEC industry standard acceptance values and test methods. The listed 'typical' values are average values summarized from a significant number of data points over many years; they are not to be identified as acceptance values.

ASTM D6871 Standard Specification for Natural (Vegetable Oil) Ester Fluids Used in Electrical Apparatus. IEC 62770: Fluids for electrotechnical applications – Unused natural esters liquids for transformers and similar electrical equipment. A transformer filled with FR3 fluid complies with the transformer temperature operating range requirements defined in IEC 60076-1.

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**Table 2**  
FR3 fluid's environmental attributes

Attribute	Results	Method
Ready Biodegradation	Readily	EPA OPPTS 835.3110 or OECD 301B, C or F
Biodegradation	>99%	Comprehensive analysis <sup>8</sup>
Acute Aquatic Toxicity	Non-toxic	OECD 203
Acute Oral Toxicity	Non-toxic	OECD 420
Biobased Material Content	>95%	USDA Biopreferred Program
Total Life Cycle Carbon Footprint	Carbon Neutral	Department of Commerce NIST BEES V4.0
Overall Environmental Impact	1.4 impact of mineral oil	Department of Commerce NIST BEES V4.0

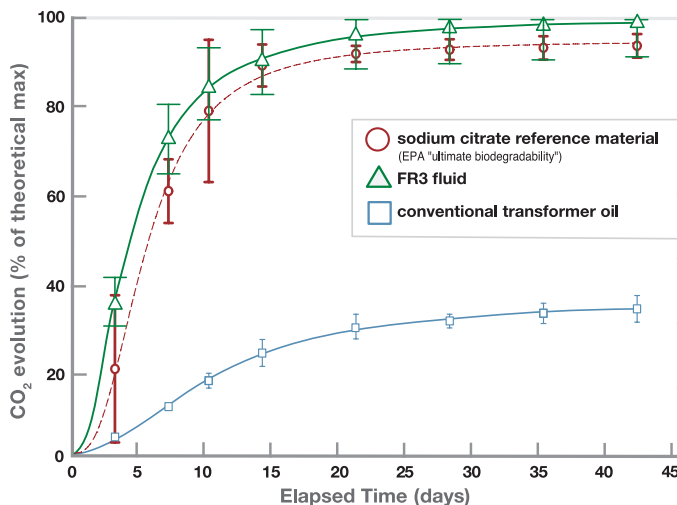
## ENVIRONMENTAL AND HEALTH

FR3 fluid is specifically formulated to help minimize health and environmental risks. The base oils come from renewable resources - commodity seeds - and are recyclable and reusable.

The US and California Environmental Protection Agencies published CARGILL FR3 fluid's Environmental Technology Verification Report in 2003. The verification process includes biodegradation and toxicity testing. Results from the aquatic biodegradation test confirm that FR3 fluid's rate of biodegradation is the same as that of the standard reference material. FR3 fluid meets the "ultimately biodegradable" criteria (Figure 1). When tested for acute oral toxicity, FR3 fluid is not toxic.

The Edible Oil Regulatory Reform Act (US Public Law 104-55, 1995) makes FR3 fluid eligible for current and future regulatory relief. The options of alternative spill response procedures, such as bio-based remediation, are now available. The fluid's inherent viscosity and tendency of thin layers to polymerize help prevent migration along the surface and into subsurface soils.

The EPA, Occupational Safety & Health Administration



**Figure 1**  
Aerobic Aquatic Biodegradation Graph EPA Test OPPTS 835.3100

(OSHA), and the Department of Transportation (DOT) do not list Cargill FR3 fluid as hazardous. Its Hazardous Material Information System (HMIS) rating is 1 for both health and reactivity. FR3 fluid is not classified as bio-accumulating or mutagenic. It is not listed as a carcinogen by National Toxicology Program (NTP), in International Agency for Research on Cancer (IARC) monographs, or by OSHA Regulation. The products of complete combustion of FR3 fluid are essentially carbon dioxide and water.

## SUSTAINABILITY

Building for Environmental and Economic Sustainability (BEES) software<sup>9</sup>, available from the National Institute of Standards and Technology, uses a life-cycle assessment approach, analyzing raw material acquisition, manufacture, transportation, installation, use, and recycling and waste management, to determine a product's global warming potential.

Table 3 shows the BEES amounts of greenhouse gas generated from raw materials through end of life for mineral oil and FR3 fluid. The cost of mineral oil, in terms of carbon emissions, is expensive. Meanwhile, FR3 fluid is relatively inexpensive, about 8.2 lb/gal less green house gas emitted to produce it. Additionally, the study reports that FR3 fluid's overall environmental performance impact score is 1/4th that reported for mineral oil (and that's without consideration for FR3 fluid's transformer insulation life extending properties). This cumulative score results from adding the impacts of water intake, smog, ozone depletio indoor air, human health, habitat alteration, global warmin fossil fuel depletion, eutrophication, ecological toxicity, critical air pollutants, and acidification.

FR3 fluid, and transformers filled with FR3 fluid are listed in the US Federal BioPreferred<sup>SM</sup> Products Program, making them readily identifiable as BioPreferred to all applicable Federal agencies. FR3 fluid is an excellent option for ISO 14000, Green Build, and other similar environmental programs that promote the use of alternative, environmental preferable and sustainable materials and procedures.

**Table 3**  
Greenhouse gases<sup>a</sup> attributed to transformer fluid for its complete life cycle.

Category	Grams Per Unit <sup>b</sup>		Tons Per 1000 Gallon:	
	Mineral oil	FR3 fluid	Mineral oil	FR3 fluid
Raw materials	1,048,184	-381,590	2.306	-0.839
Manufacturing	544,363	160,212	1.198	0.352
Transportation	122,478	71,498	0.269	0.157
Use	154,124	153,450	0.339	0.338
End of life	30,825	30,690	0.068	0.068
<b>Total</b>	<b>1,899,973</b>	<b>34,260</b>	<b>4.180</b>	<b>0.075</b>

<sup>a</sup> carbon dioxide equivalents

<sup>b</sup> In BEES 4.0e, one unit is a 1000 kVA transformer containing 500 gallons of fluid

## FIRE SAFETY

FR3 fluid has a fire point of approximately 360°C, well above the minimum of 300°C required for high fire point fluid classifications. Its flash point (approximately 330°C) is higher than the fire point of most other ignition resistant dielectric fluids in use today (Figure 2).

In laboratory and full-scale ignition tests, FR3 fluid has demonstrated greater fire resistance than other dielectric fluid types. Based on large-scale arc ignition testing, FM Global concluded that the probability of a pool fire evolving from FR3 fluid was so low that a heat release rate need not be determined or considered for FM Global approval.

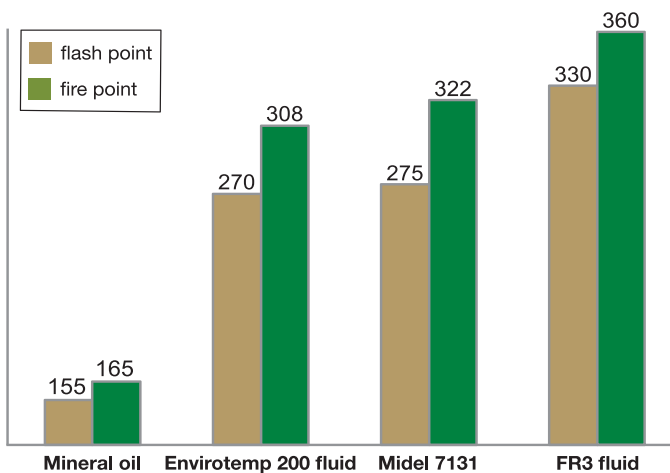
Based on large-scale arc ignition and hot metal ignition tests, FM Global recognizes FR3 fluid as an equivalent safeguard to space separation, fire barriers, and fire suppression systems for most installations.

FM Global recognizes FR3 fluid as a component of Approved transformers per FM Global Standard 3990. When used in transformers containing 10,000 gallons of fluid or less, transformers' separation distance to buildings and other equipment may be up to 1/10th the distance required for mineral oil filled transformers, without fire walls or deluge systems.

OSHA recognizes this FM Global standard as fitting the definition of a Listed and Labeled Product per NEC Section 110-3(b). The standard permits FR3 fluid-filled transformers to be installed indoors, typically without sprinklers or vaults, with a minimum clearance to walls of just 3 feet (0.9m).

UL Standard 340 compares the fire hazard ratings of various fluids. Figure 3 shows the favorable rating assigned to FR3 fluid.

There are no known reports of dielectric pool fires involving FR3 fluid filled transformers.

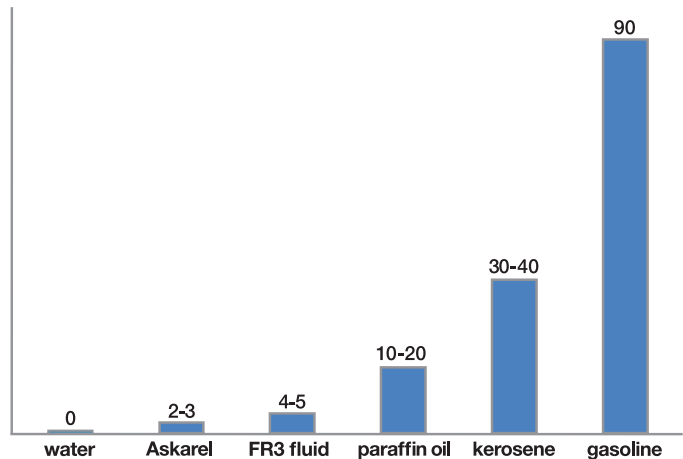


**Figure 2**  
Flash & Fire Point of Dielectric Fluids (°C).

## MEETING THE CODES

Less-Flammable fluids are recognized as a fire safeguard in Section 15 of the National Electrical Safety Code (Accredited Standards Committee C2) for generation and distribution substations. Cargill FR3 fluid meets the National Electrical Code Section 450-23 requirements as a listed less-flammable liquid. It is covered by OSHA Article §1910.305, Section 5(v).

FR3 fluid is FM Global Approved and Underwriters Laboratories Classified "Less-Flammable" per NEC Article 450-23, fitting the definition of a Listed Product per NEC. For additional information, request Cargill's NEC Requirement Guidelines 2008 Code Options for the Installation of Listed Less-Flammable Liquid Filled Transformers.



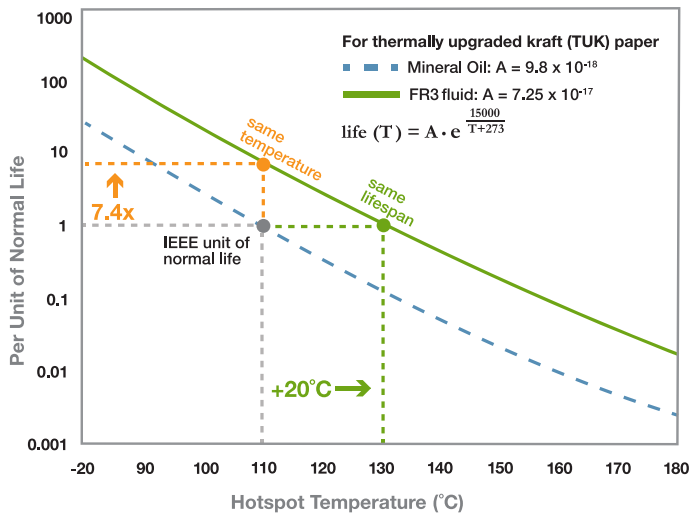
**Figure 3**  
Fire Hazard Rating UL Standard 340.

## FLUID/PAPER INSULATION SYSTEM

The unique chemical structure of Cargill FR3 fluid provides superior insulation system performance compared to other types of dielectric fluids. The thermal properties of FR3 fluid make it a more efficient coolant than higher molecular weight silicone and hydrocarbon dielectric coolants.

FR3 fluid has an exceptional ability to remove water generated by aging paper. This enables the fluid to significantly reduce the aging rate of transformer insulating paper. Per IEEE C57.100, accelerated aging tests show that Thermally Upgraded Paper (TUK) paper insulation aged in FR3 fluid takes 5-8 times longer to reach the same end-of-life points as TUK paper insulation aged in conventional mineral oil.

**Table 4**  
Arrhenius curve for thermally upgraded kraft paper immersed in mineral oil and in natural ester liquids.



The chart presented in Table 4 brings the Arrhenius curves for TUK paper both immersed in mineral oil and in FR3 fluid, as in Annex B of IEEE C57.154 or in Annex C IEC 60076-14. The degradation rate of thermally upgraded kraft paper immersed in FR3 fluid is either reduced by 7.4x or the temperature can be increased by 20°C. Any balance in between leads to relevant benefits, including:

- Higher thermal class of cellulose insulation allows increasing average winding and hotspot temperature limits without sacrificing paper life.
- Higher thermal class of liquid insulation allows increasing average winding and hotspot temperature limits without sacrificing paper life.
- Improved transformer reliability as, in a sealed unit, moisture content remains relatively constant through the years, preserving the dielectric capacity.
- No transformer outages from drying the insulation
- Extended capability and lifespan

## APPLICATIONS

### New Transformers

Distribution and Power class transformers filled with FR3 fluid for indoor, submersible and outdoor applications are available from manufacturers worldwide.

For indoor applications, FR3 fluid-filled transformers provide the proven technical and performance advantages of liquid-filled designs over dry types as well as a lower total life cycle cost when compared to all other transformer types.

Many types of FR3 fluid-filled transformers are in service: polemounted, pad-mounted, networks, reactors, small, medium and large substations, transmission substations, and generator step-ups. FR3 fluid-filled transformers are accepted in both industry and government. Contact Cargill for a copy of the FR3 Fluid User's List, Bulletin B110.

## Retrofilling Transformers

FR3 fluid is especially suited for upgrading the environmental and fire safety of mineral oil-filled transformers. It is miscible with mineral oil, high molecular weight hydrocarbons and other ester fluids. FR3 fluid is not miscible with silicone and should not be applied in transformers previously containing silicone. FR3 fluid can also be used in PCB (Askarel) replacement initiatives.

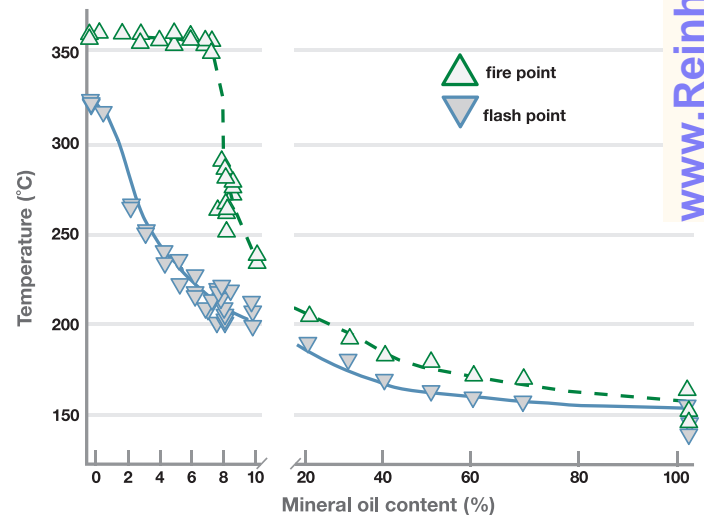
Additional advantages of retrofilling with FR3 fluid include high dielectric strength, better match of dielectric constant to Kraft paper insulation, excellent lubricity, material compatibility, and a coefficient of expansion similar to conventional transformer oil. FR3 fluid has superior resistance to coking and sludge formation when compared to conventional transformer oil. In addition to passing the Power Factor Valued Oxidation (PFVO) test, Doble Laboratories' Sludge-Free Life tests resulted in no measurable sludge. The fluid also acts as a drying agent for transformer insulation that has become wet from aging, extending the useful life of the transformer insulation system.

## Switching Devices

With excellent dielectric strength retention (Figure 5), lubricity, and gassing tendencies, FR3 fluid is an excellent switching medium at normal operating temperatures. Proven applications include new and retrofilled sectionalizing switches and transformers with load break accessories such as Bay-O-Net and current-limiting fusing, on-off and four position switches, and Vacuum Fault Interruption protection devices.

Accelerated life tests confirm stationary contacts are more stable in FR3 fluid<sup>10</sup>. In coking tests, FR3 fluid produced less than 1/20th of the deposits that were produced in conventional mineral oil.

Due to the low temperature viscosity difference of FR3 fluid compared to conventional transformer oil, the equipment manufacturer should verify applications at low ambient temperatures.

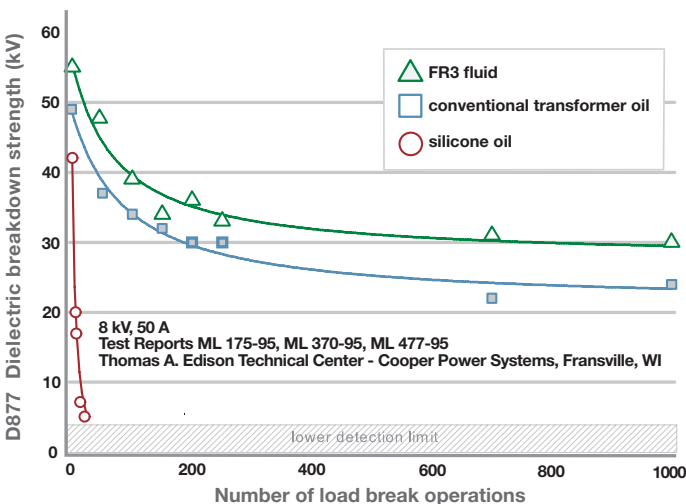


**Figure 4**  
FR3 fluid Flash & Fire Point Variation with Conventional Transformer Oil Content.

## Other applications

The inherent safety and performance properties of FR3 fluid have led to its application in electrical equipment other than transformers, including industrial electromagnets, superconducting motors, klystron modulators, transformer/rectifier sets, and heat transfer applications. FR3 fluid has excellent lubricity, an important characteristic for application in equipment with moving parts. High voltage bushing applications also appear promising due to the fluid's excellent ability to minimize insulating paper degradation and its low gassing tendency value of approximately -79  $\mu\text{l}/\text{min}$ .

**NOTE:** The suitability of each application of FR3 fluid is the responsibility of the user. Contact Cargill for application guidelines.



**Figure 5**  
Fluid loadbreak dielectric strength retention comparison.

## STORAGE AND HANDLING

Similar meticulous procedures for storing and handling conventional transformer mineral oil should be followed with FR3 fluid. To help maintain the extremely low percent moisture saturation at time of fluid manufacture, exposure time to air should be minimized. Drum and tote storage should be indoors or outdoors protected from the elements, including sunlight. Refer to the Cargill FR3 Fluid Storage and Handling Guide S10.



**Figure 6**  
Prior to shipment, FR3 fluid undergoes extensive quality assurance testing. The facilities producing FR3 fluid are ISO 9001 Certified.

**NOTE:** To maintain the optimal fluid properties for its intended use as an electrical insulating fluid, exposure to oxygen, moisture, and other contaminants must be minimized. Except for short storage periods, material that has been immersed in FR3 fluid should not be exposed to air. Thin films of natural esters tend to polymerize much faster than conventional transformer oil. For equipment drained of FR3 fluid, it is recommended that the equipment be placed in an inert gas environment, be re-immersed in fluid, or rinsed with mineral oil. Where the transformer power factor is a concern, hot air drying is an unacceptable process for assemblies already impregnated with a natural ester fluid. For impregnated assemblies that require additional drying, method of drying that does not expose the impregnated insulation to air is required to avoid excessive oxidation of the dielectric fluid.

## FLUID MAINTENANCE

Periodic preventive maintenance tests for FR3 fluid-filled equipment should follow the same schedule used for transformers filled with conventional transformer oil. Key tests on fluid samples include:

1. Dielectric Strength: The IEEE C57.147 minimum acceptable ASTM D1816, 2mm gap limits for continued use of service-aged FR3 fluid are 40 kV ( $\leq 69$  kV), 47 kV ( $69 \leq \text{kV} < 230$ ), and 50 kV ( $\geq 230$  kV).
2. Flash Point and Fire Point. Small amounts of mineral oil will not significantly reduce the fire point of FR3 fluid. Contamination above 7% may lower the fire point below 300°C. If contamination is suspected the flash and fire points should be measured.
3. Dissolved gas analysis of FR3 fluid is particularly useful for high value equipment or equipment servicing critical loads.
4. Color and appearance, dissipation factor, acid number, resistivity, viscosity, and interfacial tension are indicators of possible fluid contamination or unusual degradation.

For fluid that cannot be reconditioned, disposal options include selling to lube oil recyclers, rendering companies, or providers of fuel for industrial boilers and furnaces. Used fluid uncontaminated by controlled hazardous materials does not fall under the jurisdiction of the Federal Used Oil Regulation (CFR Title 40 Part 279).

## FUNCTIONAL SPECIFICATION FOR NEW CARGILL FR3 NATURAL ESTER LESS-FLAMMABLE TRANSFORMER DIELECTRIC COOLANT

### 1.0 Scope

1.1. This specification describes a non-toxic (in acute aquatic<sup>11</sup>, and oral toxicity<sup>12</sup> tests), biodegradable<sup>13</sup>, fire resistant, bio-based<sup>14</sup> natural ester dielectric fluid. It is intended for use in electrical equipment as an environmentally preferred, less flammable insulating and cooling medium.

### 2.0 Requirements

#### 2.1 Fluid Manufacturer

Fluid manufacturer shall have a minimum of ten (10) years experience producing and testing dielectric coolants. Manufacturer upon request shall provide AC withstand and impulse withstand for both gap and creep from 3mm to 150mm.

#### 2.2 Dielectric Coolant

The dielectric coolant shall be a biobased biodegradable, be FM Global Approved, UL® Classified as a less-flammable fluid. It shall meet the property limits listed below. The base fluid shall be 100% derived from seed oils. The dielectric coolant should have undergone accelerated aging studies via sealed tube and Locke test methods, and have published its A & B factors.

Table 5

Greenhouse gases<sup>a</sup> attributed to transformer fluid for its complete life cycle.

Property	Specification limits	Test Method
Ready Biodegradation	Readily	EPA OPPTS 835.3100 or OECD 301B, C or F
Biodegradation	>99%	Comprehensive analysis
Acute Aquatic Toxicity	Non-toxic (NOAE >10,000 mg/L)	OECD 203 ASTM D6081
Acute Oral Toxicity	Non-toxic (NOAE > 2,000 mg/kg)	OECD 420

2.3 Acceptable values for receipt of shipments of new FR3 fluid are shown in Table 5.

#### 2.4 Environmental and Health Third Party Validations

The fluid shall have a US EPA Environmental Technology Verification (ETV) Statement published. The fluid shall meet the test limits shown in Table 6.

### 2.5 Packaging

The electrical insulating fluid shall be furnished in sealed vessels suitable for the purpose, including 5-gallon containers, 55-gallon drums, 330-gallon totes, or in bulk. Each vessel shall have tampering indicating devices.

Table 6

FR3 fluid lot size and containers sampled

Lot Size (gallons)	Number of Containers Sampled
600 or less	1
601-3000	2-6
3001 or more	6 minimum (10% of quantity of containers recommended)

### 3.0 Recommended Customer Receiving Quality Control

#### 3.1 Inspection

Each lot received shall be visibly inspected for container integrity. Verify that tamper proof seals are intact and no leaks are visible.

#### 3.2 Receiving Tests

Samples shall be taken from containers per ASTM D 923 Section 2.2, as follows: When material will be combined for production, samples may be mixed together in equal proportions to create a composite sample for testing. Minimum tests required are dielectric strength and visual inspection. Dissipation factor test is highly recommended, although not essential.

### 4.0 Important information

#### 4.1 Storage

Avoid storing drums and totes outdoors. Extreme temperature variations can stress the integrity of container protective seals. Exposure of totes to sunlight can cause fluid discoloration.

#### 4.2 Intended Use

The use of electrical insulating and cooling fluid is generally dictated by the engineering design of the electrical apparatus. The electrical insulating fluid covered by this specification is intended for use as an insulating and cooling medium in electrical equipment

#### 4.3 Fluid Transfer

When transferring electrical insulating fluid from its original container, take care to prevent contamination with moisture, dust, and foreign matter. These impurities can cause deterioration of the dielectric strength and electrical performance.

#### 4.4 Partial Containers

Provide nitrogen blanket for partially filled containers, and properly seal to prevent contamination.

## REFERENCES AND FOOTNOTES

<sup>1</sup> Per OPPTS 835.3110

<sup>2</sup> Per OECD 203, Method B

<sup>3</sup> Per OECD 420

<sup>4</sup> Less-flammable transformer fluids, Approval guide – Electrical equipment, FM Approvals, FM Global, Norwood, MA, USA

<sup>5</sup> EOVK.MH10678, Transformer fluids, UL Listed and Classical Products, Underwriters Laboratories, Northbrook, IL, USA EOUV.MH10678, Dielectric mediums, UL Listed and Classified Products, Underwriters Laboratories, Northbrook, IL, USA

<sup>6</sup> National Electric Code, NFPA 70, National Fire Protection Association, Quincy, MA, USA

<sup>7</sup> Transformers, 5-4, Property Loss Prevention Sheets, FM Global, Norwood, MA, USA

<sup>8</sup> TSR IS-PG-047-1920, "Biodegradation of FR3 Fluid", Cargill technical report.

<sup>9</sup> BEES, Version 4.0e, Building and Fire Research Laboratory, National Institute of Standards and Technology, August 2007, <http://www.bfrl.nist.gov/oe/software/bees/>

<sup>10</sup> P.J. Hopkinson, L. Dix, "Tapchangers for De-energized Operation in Natural Ester Fluid, Mineral Oil, and Silicone" IEEE/PES Transmission & Distribution Conference & Exposition, July 26-30, 2009, Calgary, Canada

<sup>11</sup> Per OECD 203, Method B

<sup>12</sup> Per OECD 420

<sup>13</sup> Per US EPA OPPTS 835.3110 and US EPA OPPTS 835.8110 (ii)

<sup>14</sup> Per USDA Biopreferred minimum biobased content for Fluid-Filled Transformers - Vegetable Oil-Based

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