

Envirotemp™ FR3™ Fluid

DESCRIPTION

Envirotemp FR3 fluid is a bio-based, sustainable, 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 dozen years of field experience (with over 450,000 transformers in service) confirms excellent performance.

Envirotemp FR3 fluid is formulated from seed oils and performance enhancing additives. It does **not** contain petroleum, halogens,

silicones, corrosive sulfur, or any other questionable material. It quickly and thoroughly biodegrades¹ in the environment. The fluid is non-toxic in acute aquatic² and oral toxicity tests³. The Color Green tint reflects its favorable environmental profile (See Table 2) and readily distinguishes it from petroleum based oils.

Envirotemp 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. Envirotemp

FR3 fluid is Approved⁴ by FM Global and Classified⁵ by Underwriters Laboratories as a Less-Flammable Dielectric Liquid for use in complying with the National Electric Code⁶ (NEC) and insurance listing requirements⁷.

Envirotemp FR3 fluid is compatible with standard transformer construction materials and components. Envirotemp FR3 fluid should be stored, handled, and processed in a similar meticulous manner as transformer mineral oil, see Cargill document S900-20-1, Envirotemp FR3 Fluid Storage and Handling Guide for additional information.

TABLE 1
Envirotemp FR3 Fluid Recommended Acceptance Limits

Property	Specification Limits		Test Method
	IEEE C57.147	ASTM D6871	
Electrical			
Dielectric Breakdown, 2mm [kV]		≥35	ASTM D1816
Sampled from Bulk	≥35		
Sampled from Totes/Drums	≥60		
Dissipation Factor [%]			ASTM D924
25 °C	≤ 0.20	≤ 0.20	
100 °C	≤ 4	≤ 4	
Gassing Tendency [µl/min]		≤ 0	ASTM D2300
Physical			
Color [ASTM units]	≤1.0	≤ 1.0	ASTM D1500
Appearance		bright & clear	ASTM D1524
Kinematic Viscosity [mm ² /s]			ASTM D445
40 °C	≤50	≤ 50	
100 °C	≤15	≤ 15	
Pour Point [°C]	≤-10	≤ -10	ASTM D97
Fire Point [°C]	≥300	≥ 300	ASTM D92
Flash Point (open cup) [°C]	≥275	≥ 275	ASTM D92
Relative Density [15 °C/15 °C]	≤0.96	≤ 0.96	ASTM D1298
Chemical			
Water Content [mg/kg]			
Sampled from Bulk	≤200	≤200	ASTM D1533
Sampled from Totes/Drums	≤100	≤200	ASTM D1533
Acid Number [mg KOH/g]	≤ 0.06	≤ 0.06	ASTM D974
Corrosive Sulfur	not corrosive	not corrosive	ASTM D1275B
PCB Content [ppm]	not detectable	not detectable	ASTM D4059

¹ Per OPPTS 835.3110

² Per OECD 203, Method B

³ Per OECD 420

⁴ Less-Flammable Transformer Fluids, Approval Guide – Electrical Equipment, FM Approvals, FM Global, Norwood, MA, USA

⁵ EOVK.MH10678, Transformer Fluids, UL Listed and Classified Products, Underwriters Laboratories, Northbrook, IL, USA

⁶ EOUV.MH10678, Dielectric Mediums, UL Listed and Classified Products, Underwriters Laboratories, Northbrook, IL, USA;

⁷ National Electrical Code, NFPA 70, National Fire Protection Association, Quincy, MA, USA

⁷ Transformers, 5-4, Property Loss Prevention Sheets, FM Global, Norwood, MA, USA

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

ENVIRONMENTAL AND HEALTH

Envirotemp FR3 fluid is specifically formulated to minimize health and environmental risks. The base oils come from renewable resources - commodity seeds - and are recyclable and reusable. Envirotemp FR3 fluid does not require genetically altered vegetable oils.

The US and California Environmental Protection Agencies published Envirotemp 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 Envirotemp 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, Envirotemp FR3 fluid is not toxic.

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

The EPA, OSHA, and the Department of Transportation (DOT) do not list Envirotemp FR3 fluid as hazardous. Its Hazardous Material Information System (HMIS) rating is 0 for both health and reactivity. Envirotemp 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

TABLE 2
Envirotemp FR3 fluid's Environmental Attributes

Attribute	Results	Method
Aquatic Biodegradation [%]	>99	EPA OPPTS 835.3100
Ready Biodegradation [%]	>99	EPA OPPTS 835.3110
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	1/4th impact of mineral oil	Department of Commerce NIST BEES V4.0

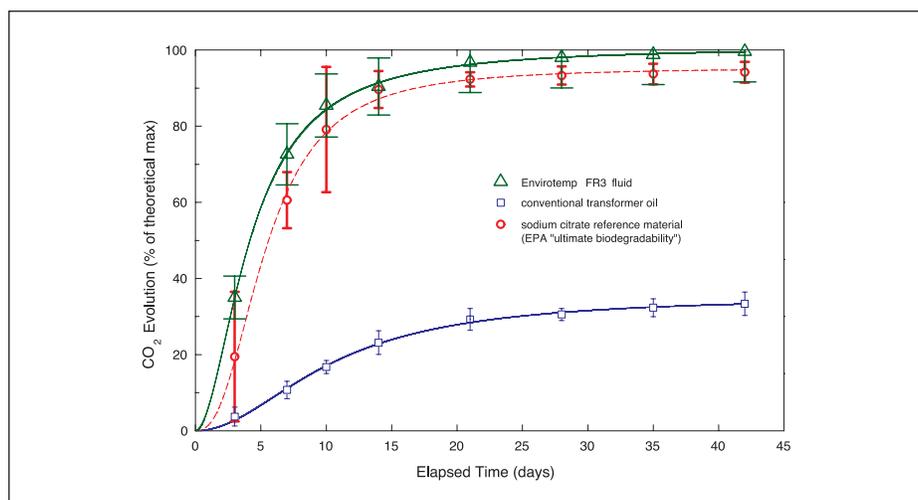


Figure 1.
Aerobic Aquatic Biodegradation Graph EPA Test OPPTS 835.3100

TABLE 3
Greenhouse gases^a attributed to transformer fluid for its complete life cycle.

Category	Grams Per Unit ^b		Tons Per 1000 Gallons	
	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
Total	1,899,973	34,260	4.180	0.075

^a carbon dioxide equivalents

^b In BEES 4.0e, one unit is a 1000 kVA transformer containing 500 gallons of fluid

of Envirotemp FR3 fluid are essentially carbon dioxide and water.

SUSTAINABILITY

Building for Environmental and Economic Sustainability (BEES) software⁸, 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 Envirotemp FR3 fluid. The

⁸ BEES, Version 4.0e, Building and Fire Research Laboratory, National Institute of Standards and Technology, August 2007, <http://www.bfrl.nist.gov/oa/software/bees/>

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 depletion, indoor air, human health, habitat alteration, global warming, fossil fuel depletion, eutrophication, ecological toxicity, critical air pollutants, and acidification.

Envirotemp FR3 fluid, and transformers filled with Envirotemp FR3 fluid are listed in the US Federal BioPreferredSM 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, environmentally preferable and sustainable materials and procedures.

FIRE SAFETY

Envirotemp 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, Envirotemp 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 Envirotemp FR3 fluid was so low that 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 Envirotemp FR3 fluid as an equivalent safeguard to space separation, fire barriers, and fire suppression systems for most installations.

FM Global recognizes Envirotemp FR3 fluid as a component of Approved transformers per FM Global Standard 3990. When used in transformers

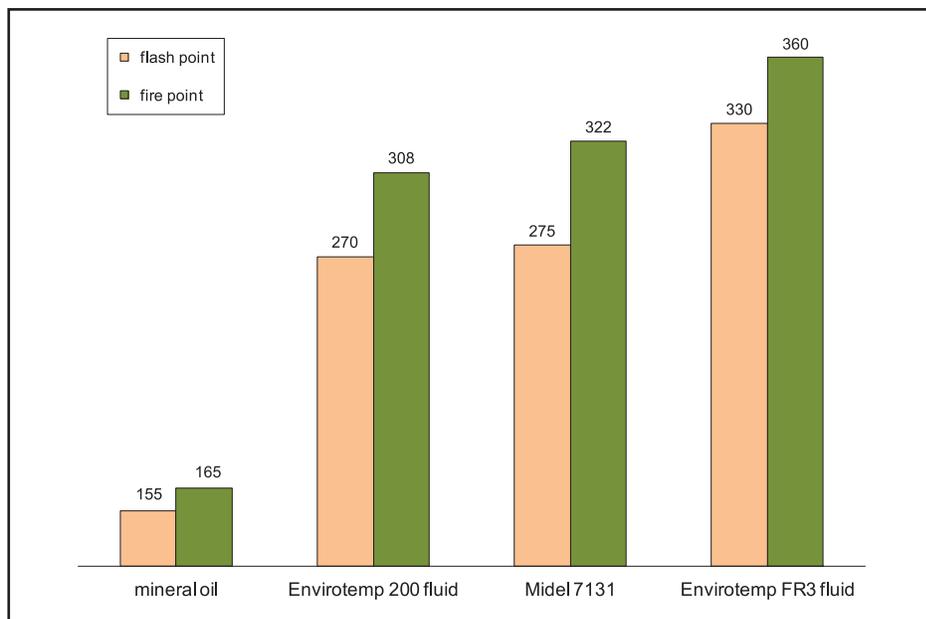


Figure 2.
Flash & Fire Point of Dielectric Fluids (°C).

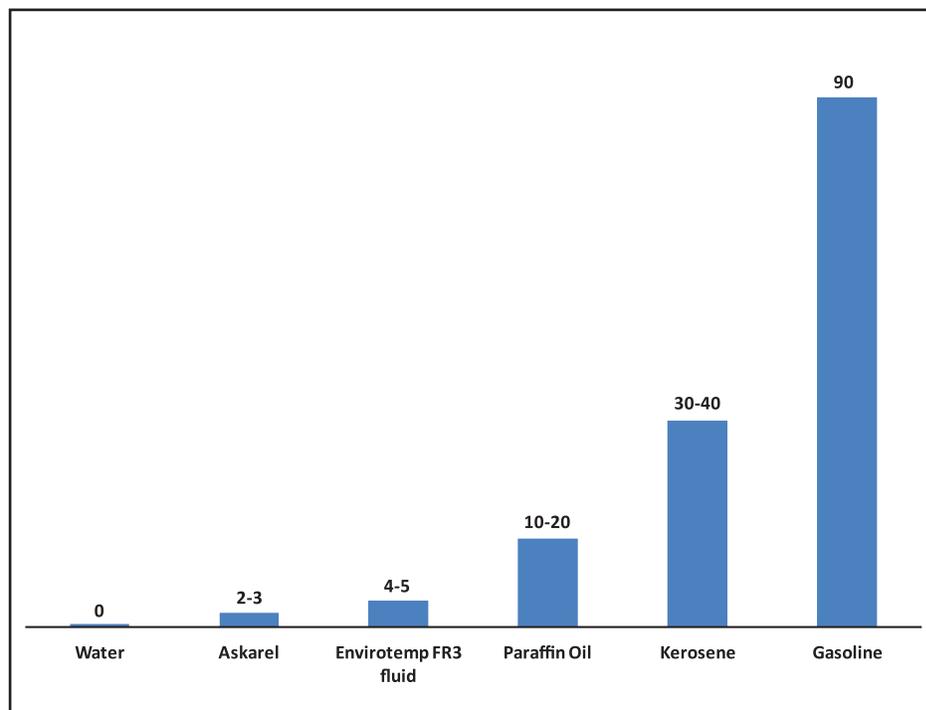


Figure 3.
Fire Hazard Rating UL Standard 340.

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.

Occupational Safety & Health Administration (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 Envirotemp 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

**TABLE 4
Transformer Insulating Paper End-of-Life (Hours)**

End-of-Life Basis	150°C			170°C			
	Mineral Oil	Envirotemp FR3 Fluid	IEEE Basis	Mineral Oil	Envirotemp FR3 Fluid	IEEE Basis	
Retained Tensile Strength	50%	3100	>4000*	1602	240	1300	323
	25%	4000	>4000*	3327	490	4000	671
Degree of Polymerization	200	3200	>4000*	3697	480	3400	746

* Paper did not reach end-of-life over the duration of the test. To be conservative, extrapolation was not employed.

3 shows the favorable rating assigned to Envirotemp FR3 fluid.

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

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. Envirotemp 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).

Envirotemp 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 CPS Bulletin R900-20-13, NEC Requirement Guidelines 2008 Code Options for the Installation of Listed Less-Flammable Liquid Filled Transformers.

FLUID/PAPER INSULATION SYSTEM

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

Envirotemp 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 Envirotemp 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 compares the time to reach insulation end-of-life for TUK paper aged in Envirotemp FR3 fluid and conventional transformer oil. The time to insulation end-of-life calculated using the IEEE C57.91 loading guide is included for comparison. Accelerated aging tests show similar thermal aging improvement for non-thermally upgraded Kraft paper.

APPLICATIONS

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

New Transformers

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

For indoor applications, Envirotemp 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 Envirotemp FR3 transformers are in service: pole-mounted, pad-mounted, networks, reactors, small, medium and large substations, transmission substations, and generator step-ups. Envirotemp FR3 fluid-filled transformers are accepted in both industry and government. Contact

Cargill Envirotemp FR3 Fluids group for a copy of the Envirotemp FR3 Fluid User’s List, Bulletin B900-99020.

Retrofilling Transformers

Envirotemp FR3 fluid is especially suited for upgrading the environmental and fire safety of mineral oil-filled transformers. It is miscible with conventional transformer oil, high molecular weight hydrocarbons, PCB (Askarel) and most PCB substitutes except silicone. Envirotemp FR3 fluid is not miscible with silicone and should not be applied in transformers previously containing silicone.

Unlike most other fluid types, the residual transformer oil in a properly retrofilled transformer should not reduce the fire point of Envirotemp FR3 fluid below the NEC minimum of 300°C (Figure 4). This is true even after full equilibrium has been achieved between the replacement fluid and the residual mineral oil in the paper.

Additional advantages of retrofilling with Envirotemp 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. Envirotemp 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, Envirotemp 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.

⁹ 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

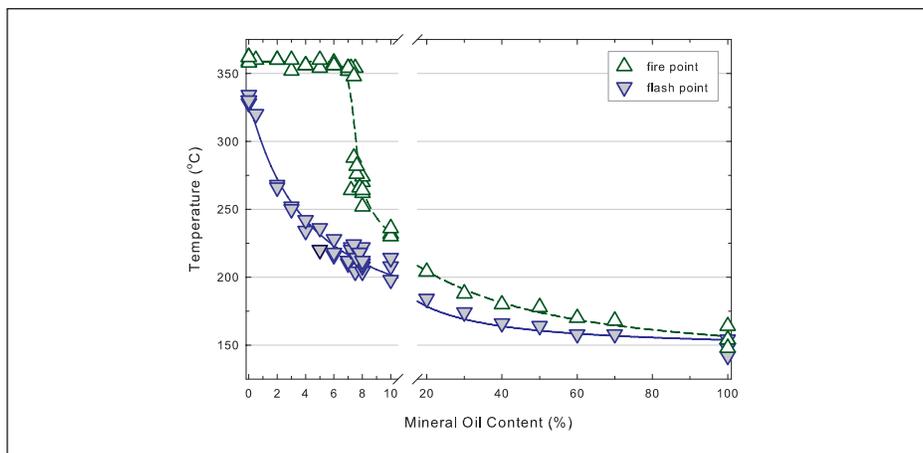


Figure 4.
Envirotemp FR3 fluid Flash & Fire Point Variation with Conventional Transformer Oil Content.

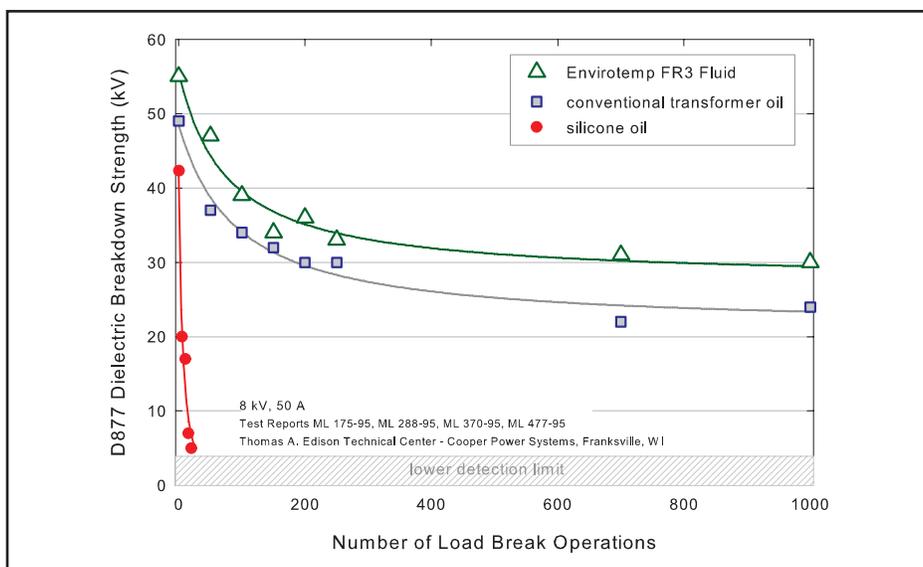


Figure 5.
Fluid loadbreak dielectric strength retention comparison.

Accelerated life tests confirm stationary contacts are most stable in Envirotemp FR3 fluid⁹. In coking tests, Envirotemp 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 Envirotemp FR3 fluid compared to conventional transformer oil, the equipment manufacturer should verify applications at low ambient temperatures.

Other Applications

The inherent safety and performance properties of Envirotemp 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. Envirotemp 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 $\mu\text{l}/\text{min}$.

STORAGE AND HANDLING

Similar meticulous procedures for storing and handling conventional transformer mineral oil should be followed with Envirotemp 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 Bulletin S900-20-1, Envirotemp FR3 Fluid Storage and Handling Guide.

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 Envirotemp 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 Envirotemp 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, a 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 Envirotemp 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 Envirotemp FR3 fluid are 40 kV (≤ 69 kV), 47 kV ($69 \leq \text{kV} < 230$), and 50 kV (≥ 230 kV).
2. Flash Point and Fire Point. Small amounts of mineral oil will not significantly reduce the fire point of Envirotemp 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.



Figure 6. Prior to shipment, Envirotemp FR3 fluid undergoes extensive quality assurance testing. The facility where Envirotemp FR3 fluid is produced is ISO 9001 Certified.

3. Dissolved gas analysis of Envirotemp 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 ENVIROTEMP FR3 NATURAL ESTER LESS-FLAMMABLE TRANSFORMER DIELECTRIC COOLANT

1.0 Scope

1.1. This specification describes a non-toxic (in acute aquatic¹⁰, and oral toxicity¹¹ tests), biodegradable¹², fire resistant, bio-based¹³ 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.

2.3 Acceptable values for receipt of shipments of new FR3 fluid are shown in Table 1

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 2

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.

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:

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)

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.

¹⁰ Per OECD 203, Method B

¹¹ Per OECD 420

¹² Per US EPA OPPTS 835.3100 and US EPA OPPTS 835.8110 (ii)

¹³ Per USDA Biopreferred minimum biobased content for Fluid-Filled Transformers - Vegetable Oil-Based

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.

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