THE CAPACITOR PEOPLE
FOR 40 YEARS

Mr. W. B. Papageorge
Manager, Product Acceptability
Monsanto Company
800 No. Lindberg Blvd.
St. Louis, Mo. 63166

August 20, 1974

Subject: Proposed Water Effluent Discharge Standards
as proposed by the E. P. A.
Federal Register, December 27, 1973

Federal Water Pollution Control Act
Public Law 92-500, Section 307

My dear Mr. Arends:

We are writing to you regarding proposed Water Effluent Discharge Standards which are of urgent concern to the electrical capacitor industry.

We urge you to:

1. Support our contention that certain PolyChlorinated Biphenyls (PCB's) do, in fact, biodegrade and therefore should be exempted as a toxic substance in the Proposed Water Effluent Discharge Standards, proposed by E. P. A. in the Federal Register of December 27, 1973.

2. Support the proposal to amend Section 307 of Public Law #92-500 to change the compliance period from one to three years.

We offer the following comments in support of our views:

The PCB's constitute a family of chemical compounds showing variations in properties from one member of the family to the next. It has been shown most conclusively that the

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lower boiling homologues of the family are biodegradable - yet E. P. A. lumps all members into the same "toxic" group - making no allowance whatever for this important difference. Certainly, logic and sound chemical judgement would recommend the exemption of those PCB's proven biodegradable.

Further, E. P. A. has established a numerical standard at a level far below the discriminatory ability of the test method recommended for determining compliance with the regulation. This means there is no practical test method for measuring the concentration. Obviously some change is needed here.

The proposed Effluent Standard applies to any and all point sources without regard to the water into which the discharge is made. No consideration is given to such questions as -- "Are the organisms presumably affected by this substance normally or potentially present in such waters?" or, "What is the importance of such organisms, and what is the nature and extent of the effect of the substance on such organisms?" or, more simply, "Have local conditions been considered in establishing the Standard?"

Finally, a one year compliance time has been written into Section 307. We in the industry know full well that this is wholly unrealistic, because planning and construction of abatement facilities for this material would take at least three years following the establishment of the required technology, if - in fact - it is possible to achieve.

We use this material in the manufacture of electrical capacitors - devices used in a wide variety of applications to promote the efficient use of electrical power. We have been in business for 40 years. Since 85% of our business is dependent on the continued use of PCB's, you can readily understand our concern - since it vitally affects the "health" of our Company, and the welfare of some 325 employees.

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We understand that amendatory legislation is being considered which would delay the implementation of these Standards from one year to three years after adoption. Further, this proposed legislation is under consideration in hearings before the House Committee on Public Works. As a member of the capacitor industry, we ask for your assistance in obtaining favorable action on this important legislation - as more time is needed to study the many problems of the proposed Effluent Water Discharge Standards.

Your cooperation will be deeply appreciated, and if any further information is required, we will be most happy to supply it.

Sincerely yours,

ELECTRICAL UTILITIES COMPANY

R. F. Carlson, President

RFC:mw

Originals of this letter mailed to:

Hon. John A. Blatnik, Chairman
House Committee on Public Works

Russell E. Train, Administrator
Environmental Protection Agency

Dr. C. H. Thompson, Chairman
Hazardous & Toxic Substances

The Honorable Chas. H. Percy, U. S. Senate
" " Adlai E. Stevenson III, U. S. Senate
" " Leslie C. Arends, House of Representatives

Photocopy to: Mr. Cliff Tuttle, Pres. Aerovox Industries, Inc.
Mr. Rich Rollins, Vice Pres. Jard, Inc.
Mr. W. B. Papageorge, Mgr.Prod.Acceptability, Monsanto Co.