B2SC Cumming Paton

May 24, 1972

Aroclor 1016 Specification

P. G. BENIGNUS

B2SL T. L. Gossage
T3A W. R. Richard
B2SL J. R. Savage
1760 R. H. Munch
B2SL H. S. Bergen
1740 R. M. McCutchan
B2NK W. B. Papageorge

I refer to Bob McCutchan's memo of May 18 relating to a change in our Aroclor 1016 specification where it is proposed to substitute "higher boiling homologs" instead of "penta and hexa chlorobiphenyls". I seriously question if this is adequate since we are still going to leave 0.4% maximum for "higher boiling homologs".

My reasons are:

1. We have presented Aroclor 1016 to the capacitor industry on the basis of lower penta- and higher chlorobiphenyls and have indicated this to be 0.4% max. in Aroclor 1016.

2. Our current certificates of analysis list penta/hexachlorobiphenyl content as x% (usually around 0.2%) without any reference to test method. To anyone reading this certificate of analysis it means the total penta and hexa homologs present come to that figure.

3. We cannot expect customers to accept the change to "higher boiling homologs" without question and maybe even suspicion. How do we reply when asked what the higher boiling homologs are? If we say penta and hexa chloro biphenyls we imply the maximum is 0.4%. If we admit penta and hexa homologs could be higher than 0.4%, then we admit our spec on "higher boiling homologs" is meaningless.

4. I realize how difficult this analytical problem is. However we have given the government information suggesting a maximum of 1.1%. I think we need to face up to this and have data showing our production of Aroclor 1016 complies with this.

5. I feel using the phrase "higher boiling homologs" avoids the issue.

Paul, I would appreciate your input on this.

Cumming Paton

cs

0151218

TOWOLDMON0057168