Monsanto

FROM (NAME & LOCATION): J. C. Weber - B2SK (St. Louis)

DATE: July 28, 1976

SUBJECT: PCB - EIA AD HOC COMMITTEE
7/27/76 - WDC

REFERENCE:

TO:

cc: H. N. Brandstetter
R. W. Flint - 1740
E. H. Harbison, Jr. - B3SA
R. E. Keller - T1B
T. H. Lafferre
A. Leisy - 1740
J. P. Mieure - T2F
R. S. Nelson - B2NA
P. S. Park - E2NE
C. Paton
M. A. Pierle - E1SF
R. G. Potter
W. W. Withers - B2SA
[redacted] Wood

Attendees -

C. Tuttle	-	Aerovox
C. L. Lopes	-	Cornell Dubilier
R. Hauser	-	Electrical Utilities
J. Flynn	-	General Electric
R. Rollins	-	Jard
G. Wallis	-	Mallory
C. P. Dibble	-	Mallory
S. Billamny	-	Mallory
R. Wills	-	Westinghouse
D. Sauter	-	Westinghouse
N. R. Clark	-	Universal
J. Butner	-	Sangamo
J. C. Weber	-	Monsanto

Prime purpose of the meeting was to formulate the action for opposing EPA regulation 307A. - "Proposed Toxic Pollutant Effluent Standards for Polychlorinated Biphenyls," as outlined in the Federal Register on Friday, July 23, 1976.

A public hearing will be held in Washington on August 20 at 10 a.m. in Room 2409 - Waterside Mall - EPA Office 401M Street S.W.

At the June meeting in Chicago, EIA formed a subcommittee chaired by Roger Wills of Westinghouse with the following members:

Richard Rollins - Jard
Bill Carrier - Mallory
David Wood - Monsanto

Their goal is to delay the effective date of 307A by at least 12 months, sometime between 7/78 and 1/79, and to raise the limitation of 1 ppb PCB per month discharge in the plant effluent going to navigable waters.

The following companies have contributed $12,500: Aerovox, Sprague, Universal, Westinghouse, EUC, Mallory and Cornell-Dubilier.

The outside counsel that has been selected is Robert B. Owen of Covington and Burlington - Washington, D.C. The committee plans to meet with Mr. Owen on Monday, August 2nd to go over the following issues:

1. Aroclor 1016 has some positive benefits over Aroclor 1242, 1254, etc.

2. Flammability issue - Risk to society

3. Economic Impact

   a. Extraordinary investment by industry to control the discharge of 5,000 lbs. PCBs or less compared to overall problem.

   b. Investment by industry on replacement fluids

   c. Some capacitor manufacture will shutdown.

4. No basis for establishing best technology as given in Versar report.

5. Open applications e.g., investment casting industries also contribute yet only the electric industry was specified in 307A.

6. Analytical problem is measuring 1 ppb PCB in industrial effluents.

7. EPA regulation without economic impact violates President's Executive Order.

8. Question - The water quality standard of 1 ppt.

9. Toxicology -

Witnesses for testifying on each of the issues will be needed and the committee requested that Monsanto testify on the toxicology issue and the analytical problems. In the June meeting, EIA understood from David Wood that we would. I told the committee that I would review this with our management and let Roger Wills know of our decision.

Monsanto also has committed to obtain the 417 references listed in the criteria document for PCBs authored by Jan Nisbet for EPA.

In addition, if Monsanto plans any written comments on 307A, these are due in the Hearing Clerks Office by August 17.

The next meeting of the EIA PCB Committee will be on August 19 with the EPA hearing on August 20 in Washington.

J. Coleman Weber

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Enclosure