D.R. Pegue B2S F

April 20, 1972

R.A. Stohr A3SB
M. Feveaux 1920

PCB IMPORTS

W.B. PAPAGEORGE
B2N K

Confirming our conversation, Myron Feveaux of our Washington D.C. office called 4/18/72 regarding the status of recent PCB imports. His Tariff Commission contact indicates total imports within the last six months have been something less than 500,000 pounds. Feveaux was unable to determine the exact= amount as the Tariff Commission had not totalled each shipment. All ports had not been canvassed and the survey to date indicated imports at only New York and Los Angeles. The Tariff Commission gave enough evidence that Feveaux suspects the source may well be MMK. They did confirm that all this material is coming from Japan and only one supplier is involved.

Our recent letter to the Tariff Commission should according to Myron suffice to gain a survey of any other PCB imports for the period 1971 to present. Our Washington office has screened imports statistics prior to 1971 and with the exception of decachlorobiphenyl none have been reported.

You asked about the chance for determining from the Tariff Commission import information on chlorinated biphenyl filled capacitors and transformers. I feel that any information developed in this area may not be meaningful. Through Myron we might have success at the Tariff Commission in pinpointing the types of capacitors and transformers normally using chlorinated biphenyls. However, according to Paul Benignus this gives no assurance that the unit is actually filled with chlorinated biphenyl. In the case of transformers the chances are good that the dielectric medium would be oil. Unless you or Dick Stohr feels strongly about pursuing the capacitor/transformer import situation further, I would recommend at this point that we work only on actual PCB imports.

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