SYNOPSIS OF TESTIMONY OF KARL BREMER, US EPA, BEFORE
HOUSE COMMITTEE ON ENVIRONMENT,ENERGY & NATURAL RESOURCES
April 27, 1976

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I) Review of EPA's position on PCB's
   A) History of PCB
   B) Typical applications, e.g. "open-ended", "nominally closed" and "closed electrical systems".
      1) Interpartmental Task Force recommended uses only in closed electrical systems.
      2) Monsanto voluntarily limited sales,'72.
      3) What has occurred since '72.
         a) Toxic Substances Act still pending.
         b) Import of PCB reported.
         c) PCB found in fish in coastal, rivers and Great Lakes waters especially through Illinois EPA (IEPA) fish monitoring program in Lake Michigan.
      4) Health Hazards
         a) PCB's produce chloracne, and skin lesions in workers exposed to PCB.
         b) Reported "Yusho" incendent.
         c) Allen studies show "loss of hair, acne, lesions, loss of weight, irregularities in menstrual cycles, impaired ability to maintain pregnancy, and undersize infants.
         d) Human PCB residue are 1ppm or more in 40.3% of adipose tissue, plus PCB residue in human milk.
         e) Rats tolerate 100ppm; subhuman primates show 100ppm is lethal and effect level is 2.5-5ppm.
      5) Pathways of PCB's to the environment.
         a) "Improper disposal of transpower oil".
         b) Vaporization from plasticizers and during improper incineration.
         c) Region V EPA stack sampling showed ambient air ranged from 140-170 ng/$m^3$. Stack concentration at Northwest Incinerator was 32,880ng/$m^3$. "Possible source include cardboards and small electrical components reaching incinerators".

d) "Paper recycling industry has detected high PCB concentration in discharges".
e) Waste oil recycling of hydraulic fluids.
f) IEPA currently working with OMC, Waukegan because hydraulic fluids (oil) containing PCB's caused discharge to range from 4.1ppm to 11ppm in December 1975.
g) Expect to deal with this problem for next 10-15 years.

II) Current action by EPA
A) Chicago conference report forthcoming in April.
B) Administration led to two conclusions:
1) Phase out PCB production & Importation.
2) Be certain PCB's don't enter environment.
C) General industry position was cooperative at January meeting with Train. "A specific timetable for phase-out was not set at that meeting, however, a meeting during May will discuss that schedule".
D) All the steps US EPA announced on January 27, 1976 were recited.
E) "Today's consideration of PCB legislation (by Illinois General Assembly) demonstrates the foresight of this committee- Michigan, Minnesota, and Indiana have passed legislation to phase-out use of PCB's. Wisconsin is anticipating their Governor's signature in a similar bill (see table 2).

III) Alternatives.
"With respect to the electrical industry, alternative replacement fluids as well as dry transformers are available."

IV) Conclusions:
BREMER gave pitch for the Toxic Substances Act and said "On a State basis, it seems that legislation to regulate and phase-out use of PCB's is a practical front-end approach to dealing with the PCB problem."

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