ATTACHMENT
RO-ED-72-30

UNITED ST[illegible] ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 24, 1972

MEMORANDUM

TO: All Regional Administrators

FROM: Assistant Administrator for Enforcement and General Counsel

SUBJECT: Policy on PCB's

Until further notice, the following policy should be followed by the Permit Program with respect to processing of permits for sources of Polychlorinated Biphenyl discharges. It is understood, of course, that by reason of the District Court injunction in Kalur v. Resor, no permit may be actually issued at the present t[illegible].

It is the policy of the Environmental Protection Agency that all discharges to the aquatic environment involving Polychlorinated Biphenyls (PCB's) be restricted to the lowest possible level. The goal of the policy is to achieve levels in the environment sufficiently low that fish and other aquatic organisms will not be damaged, that accumulations in edible fish will not exceed the FDA guidelines of 5 parts per million in the edible portion. To implement this policy, we will restrict knowing discharges to the lowest achievable level by placing all present dischargers on an implementation schedule which will seek to bring about no discharge from known sources of contamination as rapidly as possible. It must be recognized that there are reservoirs of PCB's in sewer systems and in waterways as a consequence of previous use. We should anticipate a decline over the next several months of PCB discharges from these sources as the sources are gradually cleaned out.

At the present time, the Monsanto Company is the sole U.S. manufacturer and the manufacturers of capacitors and transformers are the only users. Monsanto sells to no one else. We believe that there are less than 50 individual plants involved in these uses. In addition to these sources, there are known residues in paper that is recycled, therefore, some residue in waste from pulpmills can be anticipated. These, too, should decline over the next several months. PCB's were used in heat transfer systems,

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as hydraulic fluids, in cutting oils, etc., in the past, but Monsanto has stopped sales for these purposes and has reclaimed as much as possible from these users. It is anticipated that by the end of 1972, amounts reaching the environment from former users should be greatly reduced or near zero.

The desired limit in water is 0.01 parts per billion. Our best indicator of PCB contamination in various waters, however, will be residues in fish or in other aquatic organisms.

Excerpts from two briefing memoranda prepared by the Office of Research are attached. The interagency task force report will be provided to you as soon as it becomes available (it is now at the printers).

John R. Quarles, Jr.

Attachments

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