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GENERAL ELECTRIC

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REAL ESTATE
AND CONSTRUCTION
OPERATION

November 11, 1975

Mr. R. W. Lewis, Vice President
Corporate Operating Services
Fairfield, Conn. 06431

Dear Bob,

Enclosed is the documentation relative to the assertion by Mr. Severo in this morning's New York Times that the testimony GE presented to New York State was in apparent contradiction to testimony given by me to EPA last year.

- 1) Page 6 from my written testimony submitted to EPA in March 1974.
- 2) My response to a medically related question during cross-examination by EPA on May 8, 1974.
- 3) The medical data submitted by GE to New York State on October 29, 1975.

Very truly yours,



E. L. Simons

ELS:1
(Att.)

cc: EL Dobbins
MM Masterpool
JS Nelson
JF Repko
ES Weaver



SERVING
PROGRESS

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*from ELS written testimony
to EPA : 3/74*

Even though the proposed standards are not based directly on the alleged "high order of toxicity to man", the use of this phrase in the promulgation of the list is inimical to objective evaluation of the criteria. Although this error was called to the attention of the EPA in November, 1973⁽³⁾, the statement has not been withdrawn nor the error acknowledged. We hold that the persistence of this error may have unduly alarmed the public and thus impaired the climate for the present hearings. To the extent that EPA staff believes its own statement, the credibility of its evaluation of all related criteria must be called into question. In a document prepared by the General Electric Company⁽⁴⁾ at the request of the Office of Science and Technology, we reported:

⇒ "In the United States, medical records show that over a nearly 40-year period, the only adverse health effects experienced by U.S. workers exposed to PCBs, either during the manufacture of these liquids or of electrical equipment containing these liquids, have been limited to occasional cases of non-chronic chloracne or other temporary skin lesions or irritations." It should not be surprising if an investigator, convinced --against all evidence--of the "high toxicity" of such a material were to propose a standard completely at variance with the public need.

2. Seriousness of environmental threat

In promulgating its List of Toxic Pollutants (38 FR 24342), EPA set forth several criteria that were used in choosing pollutants for inclusion on the list. In particular, let me quote criteria 2, 3, and 4, with underlining added:

"2. The pollutant is discharged, or has the potential to be discharged, from point sources and constitutes a very serious environmental threat.

cb 1

Q Well, perhaps we can pass over that for the time being.

Have you attempted to measure the PCB levels in the sediments observed in the Hudson River?

A There have been no measurements made by us of the Hudson River.

Q Have the workers themselves been monitored? For example, have blood samples been taken and measured for PCB content?

A Before coming down here I checked with the medical director of our Pittsfield plant, who is aware of -- who can speak in terms of direct experience at Pittsfield and is aware of the situation at the other plants that use PCB's, because in our testimony we had indicated that the only medical effects that had been reported during the four decades that we were in this business have been occasional cases of chloracne or other minor skin irritations of a non-chronic nature which disappeared upon the transfer of the employee to some other operation.

I asked the medical director if that statement is still valid today; he assures me it is, and that that is the extent of the medical problems that we have encountered among the employees exposed to PCB's.

Q Well, that doesn't quite answer my question.

I asked if their blood levels have been monitored

Data submitted to NY State 10/29/75

With respect to each instance so diagnosed, give the number of employees diagnosed and the date(s) thereof.

B. State whether any GE employee employed at either of the manufacturing facilities was ordered or requested by a physician to avoid contact with or exposure to PCB's.

If so, state the number of employees so ordered or requested, the date the order or request was made or submitted to GE and submit a copy of any written report of such request or order and a copy of any writing prepared by GE with regard to each such request or order.

ANSWER TO INTERROGATORY NO. 17

17. A. Respondent operates an industrial dispensary at both manufacturing facilities. The main dispensary is located at the Hudson Falls Plant.

During the past 15 years, 49 employees have reported the dispensaries complaining of allergic dermatitis, diagnosed as having been caused by contact with PCBs. During this period 16 other employees have reported one or more of the following which may have been caused by or aggravated by exposure to PCBs:

1. nausea
2. dizziness

3. eye irritation
4. nasal irritation
5. asthmatic bronchitis
6. fungus
7. acne

The following is a summary of reported cases by years:

<u>Year</u>	<u>Dermatitis Cases</u>	<u>Other Conditions</u>
1960	0	0
61	0	0
62	0	0
63	0	1
64	0	0
65	3	0
66	4	1
67	3	3
68	6	2
69	13	4
70	3	1
71	2	0
72	3	0
73	3	1
74	8	3
75	<u>1</u>	<u>0</u>
Total	49	16

During these years, approximately 1300 employees have worked in areas exposed to PCBs.

B. The plant physician recommended that each of the 65 employees referred to in paragraph A be removed from exposure to PCBs. Each recommendation of the plant physician is contained in a medical report which is privileged.