~~1) Dr. Roush~~
2) File - PCB
GSL

E. P. Wheeler - A2SA

September 2, 1975 P. L. Wright

EPA CONCERN
[redacted] EMISSIONS & TRANSPORT

W. B. Papageorge
B2SK

The attached correspondence requires review and a response to:

Mr. Don Lokey (919) 688-8146 Ext. 501
U. S. EPA
Office of Air Quality Planning and Standards - (MD-12)
Research Triangle Park, N.C. 27711

and

Mr. James R. Smith (919) 549-8411 Ext. 2266
U. S. EPA
Criteria and Special Studies Office
Research Triangle Park, N.C. 27711

You have met Jim Smith. He has been one of the key guys in developing the EPA/air pollution posture re PCB. His "position papers" have said essentially that there is no big problem concerning air emissions of PCBs and that neither a national air quality criteria and standard nor source emission limit is necessary.

I don't know Don Lokey. He called me Monday, August 25, to inquire as to our views of the "recent" data from California that says PCB's are transported through the world's air environment by absorption on particular matter rather than through aquatic or marine systems. I told him we couldn't comment until we'd had a chance to see the report from California - (principal investigator, David R. Young - and paid for by EPA).

Lokey stated that the Young report was reopening the question of the need for control of air emission sources. He called me twice on Friday, August 29,with really no new questions but wondering if we had any thoughts as to the importance of emissions from companies making transformers and capacitors and secondly, "Did Monsanto think that the NEMA recommendations for handling and disposing of waste fluids were being followed?"

With regard to the NEMA recommendations, I told him that I thought these had been adopted as an ANSI standard and that as such, the latter would be more authoritative.

Jim Smith called Friday, August 29, also asking for our thoughts' re the California report. He stated he had been called three times earlier in the day regarding what action EPA was going to take in view of the "new data". He didn't say whether the callers were EPA employees or from outside the agency. As his letter indicates, he also asked whether we had any data concerning photodegradation of DDT to PCB's. I told him I was aware of one USDA publication that indicated DDE - a DDT metabolite - did in fact convert to a PCB under extreme conditions - Mercury arc light, etc.

Please send to both Lokey and Smith a copy of the ANSI standard (or the NEMA recommendations if the standard never issued.)

I expect you will also want to call both Smith and Lokey.

E. P. Wheeler

EPW/ch
Attachment