GENERAL ELECTRIC

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TECHNICAL

RESOURCES

December 30, 1971

SUBJECT: Benefits of PCB Use

Dr. Edward J. Burger, Jr.
Executive Office of the President
Office of Science and Technology
Room 4224, New Executive Office Building
Washington, D. C. 20506

Dear Dr. Burger:

Accompanying this letter is a statement describing the benefits to the public arising from the use of polychlorinated biphenyls in the electrical industry. It is submitted in response to your invitation to prepare material for the consideration of the Office of Science and Technology in supporting the work of the Interagency Task Force on PCB.

Whereas there is a growing body of literature on the wide dispersal, toxicology, and ecological significance of this class of materials, nowhere do we find adequate treatment of the unique properties which have occasioned its use in electrical apparatus, nor of the advantages of safety, reliability, and economy which have ensued. Our paper is offered to help remedy this lack and thereby assist in arriving at a balanced comparison of public risk with public benefit.

There is ample indication that the environment carries a significant burden of some forms of PCB. This burden derives, we believe, in some measure from the untutored waste disposal practices of the recent past, but principally from the nonelectrical uses (e.g., as plasticizers in paints and plastic materials and as hydraulic and heat-transfer fluids in industrial machinery). It is our belief that the pattern of restricted use, process control, and waste disposal engineering now being put in place by voluntary industry initiatives in the U.S. and England will, if adopted also in other PCB-producing countries, prevent significant increase in this burden. The key feature of this program is to limit

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application to sealed electrical apparatus. Our calculations indicate that the portion of electrical PCB possibly reaching the environment from field disposal and repair activities is being rapidly reduced and may be already below 1 percent of total electrical industry usage in the United States. In the near future, this class of waste should be the only category remaining, as effluent from manufacturing plants approaches zero and the nonelectrical applications are cut off at the source. The residual field waste from electrical apparatus is itself subject to further improvement, and ways to accomplish this are now under study by the C-107 Committee of ANSI. If these efforts succeed in preventing an absolute increase in such discharges as the power industry continues to grow, the contribution to the nation's total environmental burden would be so low as to require more than a thousand years to double the burden.

To the extent that this assessment is confirmed by further study and future developments, it would appear that we need have less concern for the technical problem itself than for the possibility of legislation or regulatory rulings which fail to take into account the special circumstances of electrical industry usage or the public benefits which would fall victim to any undifferentiated prohibition of PCB use.

The attached report has been prepared by a team of General Electric scientists and engineers in less than two weeks, in accordance with your recommendation of a preliminary document at the earliest possible moment. Accordingly it is neither exhaustive in its treatment nor completely consistent in the format of presentation for the various applications involved.

Please let us know if you or your colleagues desire more information on any of the points covered in the statement, or clarification of any obscurities, and we shall do our best to supply the deficiency. Thank you for the opportunity to introduce consideration of PCB benefits into the deliberations on this important public question.

Very truly yours,

John F. McAllister

J. F. McAllister
Manager-Product Quality
Corporate Executive Staff
General Electric Company

JFM/rs
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