

KIRKLAND & ELLIS

MEMORANDUM

VIA FACSIMILE

TO: Dan Smith

cc: Gary Mappes
Toni Allen
Mimi Herrington
Connie Ritzert
Steve Hamilton
Elizabeth Watson

FROM: Tim Hardy

DATE: November 15, 1994

RE: Draft Report

I'd like to see the Executive Summary tell more of the story. Can the following ideas be added to the Summary?

1. In the 1970's significant regulations (manufacturing ended, use and disposal strictly controlled) were imposed on PCBs because they were being found widely dispersed in the environment. These actions led to significant decreases in environmental concentrations, but questions have been raised about whether the decline has halted and an equilibrium reached with new loadings offsetting any natural declines.

2. Close examination of all media in the Great Lakes shows significant declines are continuing in the latest 1990's data -- no equilibrium has been reached.

3. Near-term extrapolation of the data indicates these decrease in environmental concentrations will continue; and no indication exists that new loadings (from either continued use or from disposed PCBs) will measurably retard that trend. Future environmental PCB concentrations will be a function of recycling of PCBs already in the environment rather than new loadings.