January 14, 1972

Dr. A. W. J. Dyck
Editorial Director
Paper Industry Management Association
2570 Devon Avenue
Des Plaines, Illinois 60018

Dear Dr. Dyck:

I have reviewed your PCB item which appeared in the December, 1971 issue of American Paper Industry, and have these comments to offer:

1. In the first paragraph, 1964 is identified as the year when PCB's were identified as contaminants. To the best of my knowledge, Drs. Jensen and Widmack, The University of Stockholm, first identified PCB's in pesticide residue samples in 1966. It was not until a year or two later that enough evidence had accumulated to show that PCB's were environmental contaminants.

2. I am not aware that the FDA had established a guideline of 5 ppm PCB's in packaging material. Do you have any information relating to this?

3. Differences in analytical results do occur, however, your example of 5 ppm on one try and 10 ppm on another is most unusual particularly if performed by the same laboratory. This large discrepancy may be due to unrepresentative sampling. Interference with DDT should be no problem for an experienced laboratory until the ratio of PCB to DDT exceeds about 15:1.

I hope my comments are useful. If I can be of further help, please let me know.

Sincerely,

W. B. Papageorge
Manager
Environmental Protection

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