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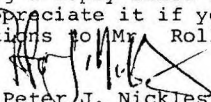
December 23, 1976

MEMORANDUM TO PCB AD HOC COMMITTEE MEMBERS

Enclosed is a copy of the brief filed yesterday on behalf of PCB Ad Hoc Committee of the EIA with EPA. Thus far, we have received the opening briefs of four of the other parties to the proceeding: EPA, Westinghouse, the Environmental Defense Fund and the Natural Resources Defense Council. Due to the bulk of these briefs (in excess of 300 pages) we are not enclosing them to all members of the committee at this time. We are, however, forwarding copies of all the briefs to Mr. Richard Rollins and will forward any one or all of the briefs to any of you upon request.

The EPA staff, along with the two environmental groups, in its brief asks for a zero discharge limit due to the substantial health hazards allegedly posed by PCBs in the environment. Both EPA and EDF place strong emphasis on the possible carcinogenicity of PCBs without mentioning the fact that Aroclor 1016 has never been shown to have any carcinogenic effects even at very high levels. NRDC and EDF both seek to exclude considerations of technology and economics entirely from the setting of a standard. EPA argues that such factors have a distinctly subsidiary role.

We will be filing a reply brief on January 5 and therefore we would appreciate it if you could give your comments and suggestions to Mr. Rollins as soon as possible.


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