UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR

In the Matter of:

PROPOSED TOXIC POLLUTANT EFFLUENT STANDARDS FOR POLYCHLORINATED BIPHENYLS (PCBs)	)	FWPCA (307) Docket No. 4

AFFIDAVIT OF DR. EUNICE M. MOORE

DR. EUNICE M. MOORE, being duly sworn, deposes and says:

1. I am the Director of Research and Development for the Electrical Utilities Company of LaSalle, Illinois. I have held my present position since 1965, having previously worked in the capacitor industry since 1956, and have been involved in the field of dielectrics my entire professional career. I attach as Exhibit A to this Affidavit a more detailed resume of my professional experiences.

2. EUC is a manufacturer of electrical capacitors including those using polychlorinated biphenyls (PCBs) as a dielectric liquid. I am familiar with measurement programs undertaken at EUC to determine the PCB levels in samples taken from the Company's effluent streams, and I am acquainted generally with the measurement techniques used by independent test laboratories to determine effluent content, although I am not myself expert in conducting these analyses.

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3. I know from my own experience with EUC's PCB measurement program of its effluent, and from my discussions with others in the industry, that reputable testing laboratories, using recognized and accepted measurement techniques, are unable in most cases to reproduce even approximately similar test results on PCB levels in identical samples of industrial effluent. Most of us in the industry have had similar experiences. I was asked to collect data from different capacitor manufacturers concerning PCB analyses of their effluent and influent water by independent testing laboratories. We were particularly interested in analyses of PCB levels in identical samples of effluent made by both the Environmental Protection Agency and one or more independent testing laboratories.

4. I attach as Exhibit B to this Affidavit a detailed table showing the results of this survey I conducted. Most of the companies that I surveyed requested that their test results be treated as proprietary business data, and accordingly that their corporate name should not be identified in my testimony. I have honored those requests for confidentiality, and have set out the data I received in Exhibit B without revealing the identity of the companies involved, or the laboratories.

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5. My survey confirmed that the capacitor industry has been unable to obtain consistent analyses of PCB levels in its influent and effluent waters. The great variation in test results of analyses of identical effluent samples strongly suggests to me that the capacitor industry is unable to rely on test results from accepted testing laboratories to determine the PCB levels in industrial effluent, and thus would find it very difficult to comply with any absolute toxic effluent standard.

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DR. EUNICE M. MOORE

Subscribed and sworn to before me this __ day of November, 1976.

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Notary Public

My Commission expires:

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