ELECTRONIC INDUSTRIES ASSOCIATION

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V. J. ADDUCI
PRESIDENT

The Honorable Rogers C.B. Morton, Secretary
U. S. Department of Commerce
Washington, D.C. 20230

Dear Mr. Morton:

On behalf of the Electronic Industries Association I would like to call to your attention a proposed action of the Environmental Protection Agency which can have a serious impact not only on a segment of American industry and its employes but also on consumers and producers of electrical energy. This proposed EPA action also could jeopardize the Commerce Departments' Voluntary Program for Appliance Efficiency which was initiated at the request of the President.

We refer specifically to the toxic pollutant discharge standards being considered by EPA for polychlorinated biphenyls (PCB), a material vital to the production of power correction capacitors used for the more efficient generation and distribution of electrical energy. These capacitors also are a vital component of the more efficient types of lighting - flourescent, mercury vapor and sodium - and also are incorporated in the electrical circuits of air conditioners, refrigerators, etc., for the more efficient use of electricity.

The salient points of EIA concern are outlined below. It is urged, however, that the Department of Commerce review in detail the enclosed statement to EPA so it will be familiar with this area of industry concern with the requirements and implementation of the Federal Water Polution Control Act (Public Law 92-500).

There are only 16 plants in this country which manufacture capacitors using PCB. They are widely dispursed geographically and in total discharge less than 5 kg of PCB daily, 0.014 percent of total daily usage.

There are over 200 variations of PCBs with different toxicological and biodegradation characteristics. It is scientifically unsound to make all compounds the subject of a single standard as proposed by EPA.

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The only U. S. manufacturer of PCB has, since late 1972, limited sales only to manufacturers of capacitors and transformers where the unique properties of this material virtually mandate its use.

The PCB material used by the capacitor industry is known as Aroclor 1016. It is more biodegradable than formulations widely used by a number of industries prior to late 1972.

Aroclor 1016 now is used only in closed electrical systems with less than 5 kg per day being discharged into navigable waters as a result of the capecitor manufacturing process.

The EPA proposed discharge standards are unnecessary and unreasonable in the light of the biodegradable nature of the formulation currently being used, and the low level of discharge.

Since industry became aware of the potential hazards of PCB it has initiated a number of costly procedures looking toward the elimination of water discharges. Deepite these efforts, it is highly unlikely that the industry can meet the proposed requirements, particularly if background levels are not discounted.

If this segment of the capacitor industry is eliminated by EPA unachievable requirements, the inflationary and energy consumption impact will be very substantial. Production of the PCB capacitor industry currently is about $140 million annually.

To overcome the electrical generation and distribution efficiencies made possible by the use of PCB capacitors, the additional consumption of fuel oil is estimated at 68 million barrels per year.

The additional cost of electrical generation and distribution equipment alone is estimated at $1 billion per year.

Your investigation of and favorable reaction to the facts presented will be sincerely appreciated.

Very truly yours,

V. J. Adduci

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