CLARK, DIETZ, AND ASSOCIATES -- ENGINEERS, INC.

Consulting Engineers

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STEEL MANUFACTURING

March 29, 1976

Inland Steel Company
30 West Monroe
Chicago, Illinois 60603

Attn: Mr. William R. Wilson
Vice President

Re: Polychlorinated Biphenyls (PCBs)

Gentlemen:

Over the past two years, Clark, Dietz and Associates-Engineers, Inc. have served the U. S. Environmental Protection Agency and a number of industrial clients regarding the control and treatment of waters containing POLYCHLORINATED BIPHENYLS, commonly referred to as PCB's. The widespread contamination of the environment with PCB's has been extensively reported in technical journals, business magazines, sports magazines, newspapers, etc.

Since approximately '72, the only domestic producer of PCB's, Monsanto, has restricted sale of this material to the electronics industry, i.e. capacitor and transformer manufacturers. It is believed that imported materials containing PCB's are still employed in the investment castings industry.

Prior to 1972, Monsanto marketed various PCB containing fluids which were used as: (1) nonflammable hydraulic fluids (e.g. Pydraul A-200), (2) heat exchange fluids, (3) printer's ink, (4) dielectric fluids (Aroclor), etc.

The nature of PCB's is such that any past use of PCB containing materials in your facilities, for any purpose, may still be resulting in water discharges containing PCB's above acceptable levels. This statement may be true even if you stopped purchasing PCB containing materials five or more years ago.

We understand that Monsanto was directed by the USEPA, under Section 307A of PL92-500, to supply a listing of all past purchasers of PCB containing materials. We further understand that the USEPA is now systematically reviewing the water discharges of past purchasers. If you made large purchases of PCB containing materials in the past, you may have already been contacted by the USEPA in this matter. If you have not been contacted, but did purchase such materials in the past, we would anticipate EPA contact in the future.

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Since we do not have the list of past PCB purchasers, which is held only by the USEPA and is confidential, we would suggest the following course of action:

1) Review your current and past operations to determine if you purchased any PCB containing materials. Yes sure

2) If you did purchase such materials or are in doubt, collect grab samples of your water discharges (include process water, cooling water, etc. discharges to surface streams or municipal discharges as well as storm water discharges) and have them analyzed for PCB's.

3) If your analyses show PCB levels at or above two (2) micrograms per liter (ug/l), initiate a program to define the extent of contamination of your facility and means of reducing or eliminating the discharge of PCB's.

Neither the sampling nor analytical methods employed for PCB's are as straight forward as they may appear. If you find the need for this step, we would be pleased to assist you in obtaining representative samples and obtaining or recommending the services of a qualified analyst in your area. If preliminary results indicate the need for more extensive monitoring and/or control, we are confident our experience in this area would prove invaluable to you. We would be pleased to provide additional information relative to our experience and references, if you desire.

Please contact either Mr. J. R. Crawford or me at 317/384-1400 if we can be of assistance.

Very truly yours,

CLARK, DIETZ AND ASSOCIATES-ENGINEERS, INC.

Kenneth S. Price

Kenneth S. Price, Ph.D., P.E.
Vice President - Operations

KSP:lsa

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