(802) 442-3173

JARD Company Inc.

Bennington, Vermont 05201

10 September 1976

Dr. Ed Simon
Manager
Environmental Protection Operations
GENERAL ELECTRIC COMPANY
Building 36, Room 120
1 River Road
Schenectady, New York 12345

Dear Ed:

The Electronic Industries Association (EIA) has, through their PCB Ad Hoc Committee, become an objector of record to the Toxic Pollutant Effluent Standards PCBs - FWPCA 307 (Docket No. 4) which have been proposed as in Federal Register of July 23, 1976. Our counsel is Peter Nickles and Steve Rosenthal of Covington and Burling.

The general thrust to our objections appears in the attachments along with other objectors submittals. We plan to have the capability (by contracted experts) to critically examine the strengths of the EPA in six areas:

1. Criteria
2. PCB toxicity to fish and other aquatic organisms
3. PCB toxicity to birds and mammals
4. Treatment of discharges containing PCBs
5. Economic impact of industry meeting regulations and/or substituting for PCBs
6. Capability of analytical techniques to quantify PCBs in industrial effluents

The EPA witnesses and our proposed experts have also been categorized to these groups as follows:

	EPA Witness	EIA Expert
1.	Criteria: 2*Nisbet 17*Guarraia	Dr. Coulson (Albany Medical)
2.	PCB Toxicity to Fish & Other Aquatic Organisms: 1*Mount 3*Veith 4*Nebeker 5*Hanson 6*Nimmo 7*Young 8*Riseborough	Dr. Lauer
3.	PCB Toxicity to Birds & Mammals: 11*Ringer 12*Allen 13*McNulty 14*Kimbrough 15*Squire 16*Galboin	Dr. Coulson

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	EPA Witness		EIA Expert
4. Treatment of Discharges	18*Sargent 22*Westgate	20*Rizzo Research	Outside Consultant (Hired by Westinghouse)
5. Economics	21*Dupuis	23* X	Industry Spokesman
6. PCB Analysis	3*Veith	9*Munson	Westinghouse In-House Expert

*EPA Witness Number

As of now, there have been no firm commitments to the outside experts from the EIA or vice versa even though there soon may be. The point is that if you can suggest other people than those above, we would appreciate having your suggestions.

Hearings begin on September 27, 1976. Our cross-examination of the EPA witnesses must therefore be prepared prior to September 24, 1976. Prior to the hearing commencement the objectors must provide a list to EPA of the witnesses to be cross-examined.

Given these restraints in time, it will be difficult for you to become even acquainted with the mass of material, but, as soon as possible, our committee and lawyers will be available to meet with you, whenever and wherever appropriate such that we may get your appraisal.

Regardless of the contribution, let me at this time thank you and General Electric for the offer to help and whatever expertise and advise which can be provided. It is very much appreciated.

Very truly yours,

JARD COMPANY, INCORPORATED

Richard L. Rollins
Vice-President
Engineering

RLRlm
Attachments (4)
cc: T Nourse
C Tuttle
S Rosenthal
R Wills
D Wood

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