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SUBJECT General Electric PCB Paper

REFERENCE

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TO G. Roush, Jr., M.D., G2WG

This review presents many pieces of information and interpretations that if publicly available should improve the state of knowledge relating to PCB's. We should do whatever is possible to encourage the publication of this information. In its present form, I believe it is being developed solely for use within GE (page 3, ¶4). In addition to their employees, there are several other audiences that should be reached. While it is useful to have a document, such as the present one, aimed at the layman, it is equally important to have the supporting technical information published in a reputable journal.

It would be extremely useful for GE to publish a review of the morbidity and mortality studies that they have outlined beginning on page 14. The obvious conclusion is that at this time no evidence of disease exists. A comparison of the differences between the epidemiology data, Yusho data, and animal data could then be presented in the discussion. This could logically lead to an extrapolation of the epidemiology findings to the expected lack of effect from environmental exposure. A journal such as JOM or AIHA would be a likely place for publication. This approach would require that they lead with the workplace exposure, blood level, and worker health data.

Another area that could be developed further relates the known cases of exposure to foods containing PCB. They point out that the Yusho symptoms were probably due to chlorodibenzofuran exposure. This could be contrasted with the worker information and with the individuals consuming large amounts of Lake Michigan fish. I also believe that there has been a recent accidental contamination of cooking oil with PCB ex-U.S. I have not seen any information on the people exposed.

The sections on regulations and on-going programs should not follow the summary unless the summary is moved to the front of the manuscript. The section on on-going programs states some activities that are underway without defining how the expected results will contribute to the resolution of the situation. Furthermore, it raises for the first time the apparent difficulty in low level PCB blood analysis. I suggest these be stated in a manner that will define what will be done and how it will relate to human or environmental health such as: Determine the PCDF content of PCB's in major existing capacitor and transformer materials and define acceptable ways of handling these materials to minimize their potential hazard to humans and the environment.

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There are two specific points that I would like to see documented more fully.

- 1) On pages 1 and 11, they state that U.S. manufactured electrical grade PCB's contained 0-2 ppm PCDF.
- 2) On pages 2 and 18, they state that environmental exposure to 0.1-10 ug/m³ of PCB in air may occur.

They do not give a basis for these statements.



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