AEROVOX INDUSTRIES, INC.

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October 8, 1975

Mr. Richard D. Norling
Legislative Assistant
Gerry E. Studds
Member of Congress
1511 Longworth House Off. Bldg.
Washington, D.C. 20515

Dear Mr. Norling:

Wayne Peterson and I should like to express our thanks for the time you gave us last Thursday. As promised, enclosed is the following material:

1. An EPA report comparing Aroclor 1016 (which is used by A.C. capacitor manufacturers) with Aroclor 1242 (which is used by transformer manufacturers). This report certainly gives reason to question the FDA standard of five parts per million in fish as being the maximum that may be safely ingested by human beings. You will note that in this report rats were fed a 100 parts per million diet for six months with no ill effects. It is beyond our comprehension why this 18-month-old report was not circulated previously by EPA.

2. Reprint of a Business Week article on PCB which we feel is an accurate presentation of the entire problem.

3. Two copies of the EIA Position Paper.

Mr. Norling, what we are concerned about is that EPA is using PCBs to orchestrate support for the Toxic Substances Act. We in no way disagree that past practices of PCB users and prior formulations were harmful to the environment. Unfortunately, there is little that can be done to rectify this except to let time slowly erase it.

On the other hand, we feel that current practices and the very benign Aroclor 1016 being used in A.C. capacitors are not harming the environment. Our contention is that PCBs, because of their fire retardant capability and excellent dielectric characteristics are necessary in closed-electrical systems. The fire hazard potential of lighting capacitors mounted in the ceiling of buildings and installed in consumer items such as, air conditioners and television sets is significant.

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As far as Aerovox and Cornell are concerned, I think we have co-operated in every way with EPA as well as our local office on water quality. I also feel that Monsanto, by restricting sales in the early 1970's to electrical systems and by developing the premium priced Aroclor 1016, has done its best to curtail the effects of PCB in the environment going forward. I definitely feel that EPA should issue a regulation on PCBs, not so much because it is needed today, but to insure that industry does not slip back into bad habits. My concern is that the regulation accomplishes the following:

1. because of the nature of the process, capacitor manufacturers cannot achieve zero discharge. Therefore, the regulation has to be one that is achievable or the effect will be to ban PCBs and force us to use flammable impregnants;

2. differentiate between the various PCB compounds that are available since only capacitor manufacturers, for technical reasons, are able to use the biodegradable 1016;

3. ban the importation of the very high homologs that are used in investment casting. I have very real concern that these are going into the environment in large quantities and their effect may be attributed to the manufacturers of closed-electrical systems.

If I may provide any other information or answer any other questions, please do not hesitate to contact me. Thank you again for listening to our side of the story.

Very truly yours,

Clifford H. Tuttle
President

CHT/eb
Enclosures

cc: Mr. Tyler Nourse - EIA
Mr. Wayne Peterson - CD