From the desk of

W. B. PAPAGEORGE

1/14/74

Messrs.

H. S. Bergen
W. R. Corey
P. S. Park

Second draft. Your comments please.

W.B.P.

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2nd DRAFT

(Letter to PCB Customers)

Dear Mr.:

As your supplier of Aroclor®, Inerteen® and Pyranol®, which your company purchases for dielectric fluid applications, we would like to take this opportunity to share with you the information we have of the Environmental Protection Agency's recent actions relating to PCBs in effluent streams.

1. On July 6, 1973, the EPA published in the Federal Register a proposed list of Toxic Pollutants. PCBs were included on the list.

2. On July 16, July 30, August 1, August 3 and November 29, 1973, public hearings were held by the Effluent Standards and Water Quality Information Advisory Committee to consider information pertinent to proposing effluent standards for toxic pollutants.

3. On September 7, 1973 the Toxic Pollutants list was published without change.

4. On December 27, 1973 the EPA published proposed effluent standards for the Toxic Pollutants. Persons adversely affected by the proposed standards may file, by January 18, 1974, objections according to rules published January 4,

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1974. Comments may be submitted in writing within 90 days. A public hearing will commence on January 25, 1974.

Copies of the Federal Register notices which pertain to these actions are attached for your use.

During this period Monsanto has commented both formally and informally to the EPA and to the Advisory Committee. Copies of our comments are attached. In addition, the General Electric Company has submitted comments. Copies of these are also enclosed.

The EPA acknowledges that time limitations established by court order required publication of the proposed standards at this time and that in some cases there may be inadequacies in the underlying data base. Comments and technical data are solicited. Industries involved with PCBs are expected to comment.

We sincerely believe the standard proposed for PCBs is unrealistically low and unwarranted and we are deeply concerned of the adverse effect it will have on the continued use of PCBs with the resulting harmful impact on the power generation and distribution industry at a time when our nation is experiencing a serious energy crisis. We believe that we should all express our concern to the EPA in writing and by participating at the public hearing.

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We strongly urge that your company, either independently or through your trade organizations, submit appropriate comments and participate at any of the public hearings which will be held during the next 90 days.

Mr. Alan W. Eckert, Office of the Deputy General Counsel, Water Quality Division, EPA, has informed us that the January 25th meeting will be a prehearing conference. Any person desiring to submit comments or to testify at subsequent sessions must inform the presiding officer of his intentions at this prehearing conference. Persons adversely affected by the proposed standards may file, by January 18, 1974, objections as outlined in the Federal Register, Vol. 39, No. 3, January 4, 1974; a copy of which is attached.

Correspondence relating to objections and public hearings should be submitted in quadruplicate and filed with the:

Hearing Clerk
U.S. Environmental Protection Agency
Washington, D.C. 20460

Opportunity also exists for submitting comments during the 90-day period ending March 27, 1974 to:

Dr. C. Hugh Thompson
Chairman, Hazardous and Toxic Substances
Regulation Task Force
Office of Water Program Operations
U.S. Environmental Protection Agency
Washington, D.C. 20460

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The U.S. Department of Commerce has expressed a strong desire to be of service to industry in this matter and would like to receive copies of correspondence, comments, presentations, etc. This material may be sent to:

Mr. Fred Stein
Office of Environmental Affairs
U.S. Department of Commerce
Room 4424
Main Commerce Building
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

We plan to keep you further advised of our activities in this matter and hope you can share with us any information your company may have to offer.

Sincerely,

T. L. Gossage
Marketing Director
Specialty Products
Functional Product Groups

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