

W. B. PAPAGEORGE - ST. LOUIS

January 7, 1971

PCB LEVELS IN AIR -
ANNISTON PLANT

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The data contained in your letter of December 29, 1970 is very informative in that it gives us an idea of the PCB levels in the air to which our employees could be exposed.

Since we are lacking information on air movement at each location it is very difficult to equate the PCB concentration found to the amount of PCB eventually entering the environment.

For air pollution control purposes, a more meaningful measurement could result from the analysis of vapors from known sources and a measure or estimate of the rate, duration, and frequency of the vapor flow. Sources would include tank vents, jet exhausts, tank car and tank truck openings, drumming locations as well as leaks and spills, which must be infrequent.

To communicate effectively performance in controlling vapor losses, I believe we must report these losses in actual pounds per day averaged over a period of time versus a target.

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