FROM (NAME & LOCATION) D. B. Hosmer - E1SF General Offices

DATE : December 4, 1973

SUBJECT : POLY CHLORINATED BIPHENYLS

REFERENCE

cc: F. J. Holzapfel B3NA
G. L. Bratsch 1740
W. B. Papageorge B1ND

TO : ✓A. E. Leisy - 1740

Attached is a copy of the testimony that we presented to the ESWQIAC committee in Washington, D. C. on November 29, 1973.

This testimony was presented as a response to a specific request that we testify by Dr. Martha Sager, the Chairman of the Committee. Our presentation was made by Bill Papageorge. It was well received and Bill was given good attention.

Immediately prior to our testimony, Mr. Hugh Thompson and Mr. John Rhett made a presentation on their proposed effluent limits for the 10 materials now included on the Toxic Materials List. The basis for the criteria for effluent limits was explained and some of the limits were listed.

If I understood correctly, under the Toxic Substances Division proposal, Monsanto-Sauget would be restricted to 0.00000648 x the receiving body water flow in cubic feet per second. Then there was the added restriction - the maximum cubic feet per second of flow is limited to a maximum of 10,000 cu. ft./sec. On this basis PCB's at WGK would be limited to 0.0648 #/day. The details of the Rhett-Thompson proposal are scheduled to be published in the Dec. 3 Federal Register.

Immediately following Bill Papageorge's testimony, which recommended 1# PCB's/100,000# production, one of the Toxic Substances employes stated on the record that their limitations were in the nature of a proposal, that they were not after Monsanto, and we could negotiate on the number. He said this in a very friendly fashion. If we use the average flow of the Mississippi River as the multiplier, we get:

$$0.00000648 \times 180,000 = 1.166\#/\text{day}$$

We, of course, will initiate action after the Toxic Substances proposals are published in the Federal Register. There will be

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a 90 day period for hearings with the regulations finalized at about June, 1974. Then they will become effective in June of 1975.

Obviously, we will make a vigorous try for a 1.4# day effluent limitation. Meanwhile WGK must get down to a 1#/day level from the total plant effluent as soon as possible.

D. B. Hosmer

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Enc.

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