H. S. Bergen

GENERAL ELECTRIC

IAL COMM

DEPT. I&PCPD

ADDRESS. Hudson Falls

SUBJECT.

DATE. August 21, 1972

COPIES. LP Hart, Jr.
JF Repko-Syracuse
PG Benignus-Monsanto
RJ Boudreau

JF
The Book
GE COM

R. J. Hopkins
Bldg. 1-4

The following are appropriate comments that should be transmitted to Dr. Dakin for use during the PCB discussion at the September 5, 1972 CIGRE meeting.

ANSI Committee C-107 has been functioning since about May 1971 to establish Guidelines for the handling and disposal of PCB's and apparatus containing PCB's for both transformers and capacitors. The draft of the Guidelines is now being printed and we expect that sometime in September it will be circulated to all members of this ANSI Committee, which includes both industry and government members. This draft Guideline has been formulated primarily by the electrical industry members.

In May 1972 a government Interdepartmental Task Force on PCB's issued their report entitled "Polychlorinated Biphenyls and the Environment". This report is a result of an in-depth study of PCB's, their toxicology, and environmental effects. Attached is a copy of page 4 of this report where Items 6 and 7 are pertinent conclusions relative to PCB filled capacitors. It is to be noted that Item 7 does not offer objection to clean landfill disposal of solid wastes.

The Interagency Task Force Study represents what we believe to be the most complete tabulation and evaluation of available data and information on PCB's. It is encouraging that they reached reasonable conclusions based on the available data. There is no evidence of imminent danger to mankind if PCB's are used and handled with care. There is a need to minimize its entry into the environment to avoid affecting certain fish and bird wildlife. The long term chronic effects of PCB's are not yet well understood and are currently under study.

It is our opinion that PCB's will not be banned in the U.S. for use in capacitors, as has been done in Japan. This is the flavor of the Interagency report.

Commercial incineration services are available for the disposal of liquid PCB wastes and "software" contaminated with PCB's. At the present time there are no commercial incineration services available in the U.S. for disposal of scrap capacitors. Capacitor manufacturers in this country are recommending disposal of all scrap PCB liquids by controlled high temperature incineration, and disposal of scrap capacitors in clean landfills which are isolated from rivers, lakes and natural waterways. These disposal procedures are contained in the ANSI C-107 Guideline which will be reviewed by governmental members shortly.

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A. Pozefsky

5. Housekeeping is particularly important in the manufacture, use, and disposal of PCBs. Under a program of limitation on the sale of PCBs, the electrical industry will continue to be the principal user of PCBs; it, as well as industries now holding inventories of PCBs, have a special responsibility for monitoring and controlling their wastes. In this connection, the Environmental Protection Agency will restrict industrial fluid discharges of PCBs from PCB users. To keep levels in fish as low as possible, and in any case below FDA's interim action level of 5 parts per million, concentrations in rivers or lakes from all sources should not exceed 0.01 parts per billion.

6. The use of PCBs should not be banned entirely. Their continued use for transformers and capacitors in the near future is considered necessary because of the significantly increased risk of fire and explosion and the disruption of electrical service which would result from a ban on PCB use. Also, continued use of PCBs in transformers and capacitors presents a minimal risk of environmental contamination. The Monsanto Company, the sole domestic producer, has reported voluntarily eliminating its distribution of PCBs to all except manufacturers of electrical transformers and capacitors.

Pending passage of the Toxic Substances Control Act, the Federal Government does not have the legal authority to impose restrictions corresponding to the actions reported by Monsanto. Although some Federal enforcement authority is available, the Federal Government does not have the authority to control PCBs at their source.

7. Most capacitors presumably have been disposed of in landfills. PCB containing material buried in soil is not expected to migrate but should remain in place. In the past, many fluids containing PCBs have been disposed of in sewers. More appropriate means of disposal such as high-temperature (at least 970°C) incineration must be used instead.

8. PCBs are manufactured in countries other than the United States. Importation of PCBs as a chemical or as a component in products remains legally possible because the Toxic Substances Control Act has not yet become law. Electrical products imported from abroad may contain PCBs. The task force looks to international agreements to bring about some multi-national understanding on the sale and use of PCBs globally. Importation of PCBs for uses other than those singled out in the present pattern of voluntary limitations should be avoided by users.

As an additional measure, the United States has asked the Organization for Economic Cooperation and Development (OECD) through its Environment Committee to make a special review of member states' national policies concerning PCBs and also to identify products moving in international trade which contain PCBs. OECD, whose membership includes all major Western industrialized states plus Japan and Australia, has been giving priority attention to the problem of PCBs over the past year.

9. More scientific information about PCBs is needed, and several Government agencies are seeking it through research. The task force recognizes that the scientific basis of much of our knowledge must be

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