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GENERAL ELECTRIC

CORPORATE RESEARCH AND DEVELOPMENT

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DIAL COMM 8*235-

Building K-1, Room 3V35
November 27, 1978

R.C. Osthoff
Manager - Transformer Laboratories
Transformer Laboratories Operation
100 Woodlawn Avenue
Pittsfield, Massachusetts 01201

Dear Bob,

I enclose a xerox of the latest, and I presume final, communication from NIEHS on the composition of used transformer Pyranol; and also a copy of my thank-you letter to McKinney, which I wrote in such a way as to ensure full comprehension of his conclusions by anyone rummaging through our files at a later date.

You will note that I made no commitment to McKinney about the further pursuit of the work; however, this remains a possibility that we may wish to consider seriously. Three years ago, when you first brought the used oil sample over here, CRD was not really in a position to work on that kind of material. The available analytical equipment was less than fully satisfactory, and the analytical people had no facilities for handling highly toxic materials like PCDF's. Today, however, they do have the high resolution capillary GC and the ultrahigh resolution mass spec equipment needed to do the job; we now know from McKinney's work that there's nothing particularly hazardous about any of the sample fractions; the general inclination of the analytical people is positive rather than negative; and if we were willing to go for order-of-magnitude quantitation (to avoid having to handle PCDF standards) the job could be done in a few days.

In addition, the question of PCDF's in tri- and tetrachlorobenzenes may be one that we should try to understand more fully before EPA takes off on the same tack that McKinney did in his September 22 letter (potential grave hazard arising from photochemical conversion to PCDF's.) As you are aware, on October 30 EPA added the tri- and tetrachlorobenzenes to the Interagency Testing Committee's priority list, which means that we'll probably be having to submit all of our health- and environment-related data on them to EPA under TSCA 8(d) sometime next summer. It might be desirable to have something more definitive on the PCDF issue then just the McKinney-Brown correspondence to send in at that time.

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R.C. Osthoff

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November 27, 1978

You suggested possibly holding a strategy meeting after you'd had a chance to digest the attached epics. Give me a call if you're still so inclined.

Sincerely,

John Brown

John F. Brown, Jr.
Mgr - Life Sciences Branch
PHYSICAL CHEMISTRY LABORATORY

cc: RA Stenger
JS Nelson
RE Brooks
JW Fawcett

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