ELECTRONIC INDUSTRIES ASSOCIATION

2001 EYE STREET, N. W.
WASHINGTON, D. C. 20006

659-2200

June 25, 1975

V. J. ADDUCI
PRESIDENT

The Honorable Russell Train, Administrator
Environmental Protection Agency
401 M St., S.W.
Washington, D.C. 20460

Dear Mr. Train:

On behalf of the Electronic Industries Association, I am submitting to you herewith a statement which was approved by our Board of Governors at its recent meeting expressing grave concern over the proposed toxic pollutant effluent discharge standards for polychlorinated biphenyls (PCB) currently under consideration by EPA.

While members of the electronic industries, and particularly the manufacturers of capacitors using PCB, share your concern over the need to protect our environment, toxic pollutant discharge standards currently under consideration are so unreasonably stringent as to threaten the existance of a vital segment of American industry.

Briefly, our position is this.

Since the early 1970s when scientific investigation indicated that PCBs presented some hazard in the environment, capacitor manufacturers using this material have expended considerable money and effort to reduce discharge levels. At present there are 14 companies with 16 plants using PCB for capacitor manufacturing and in total their PCB daily discharge is less than 5 kg, 0.014 percent of daily usage. These companies are widely dispersed geographically.

Since late 1972 the only U.S. manufacturer of PCB has limited its sales to manufacturers of capacitors and power transformers where the unique properties of this material requires its use. The formulation currently available has been reduced in chlorine content and is much more biodegradable than the PCB

MONS 094579

material available in the past to a wide range of users. Capacitors and transformers are closed systems and there is only a small amount of material which escapes during the manufacturing process.

Due to the wide use of PCB in the past, much of it in open systems and with a high chlorine content, this material is found today in a number of water bodies. In formulating its discharge standards, EPA must recognize that background levels do exist and take them into consideration in establishing its requirements.

If the PCB discharge standards currently under consideration are promulgated, it is highly unlikely that they can be met by the capacitor and power transformer industries. If industry is forced by EPA to discontinue production of these items using PCB, there will be a very substantial inflationary impact on the cost of generating and distributing electrical energy. Fuel requirements for electrical generation also will be increased substantially.

EIA strongly urges that in the promulgation of toxic pollutant discharge standards for PCB it consider carefully the enclosed statement and recognize the current limited use of this material; its existance in many water systems; the biodegradable nature of the material presently in use; the very limited discharge of this material, and the severe impact on the economy and fuel requirements of this nation which could result if EPA standards force discontinuation of the manufacture of capacitors and transformers using PCB.

Very truly yours,

V. J. Adduci

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