AEROVOX INDUSTRIES, INC.
New Bedford Mass. 02741

Xerox

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APR 19 1976

April 16, 1976

EIA PCB Ad Hoc Committee

Messrs. Clark, Rollins, Sauter and Tuttle met with the Department of Commerce on April 9. A list of those attending from Commerce follows:

Commerce Dept.

OEA - Dr. Galler, Miss Lewis, Mr. Cox, Dr. Hartwell
Office of Policy - Mr. Phil Drury, Ernie Loeb, Bill Sullivan
DIBA - Dr. Edwin Shykind, Saul Padwo
NBS - Dr. Oskars Petersons

Attached is a more comprehensive list which includes titles and telephone numbers.

Dr. Galler is Deputy Assistant Secretary for Environmental Affairs and, at his request, the meeting was off the record; therefore, this memo only summarizes the general discussions.

1. Various members of EIA presented the AC capacitor situation as follows:

   a. total capacitor market
   b. differentiation between AC and DC
   c. a breakdown of the AC capacitor market
   d. description of the electrical distribution system in the U. S.
   e. advantages of Aroclor as an AC impregnant
   f. discussion of alternate impregnants
   g. discussion of dry metallized construction with emphasis on why, with today's technology, this is not applicable to U. S. capacitor requirements;
   h. presentation of general toxicity data on 1016 and comparison of environment liability versus the assets of non-flammability;
   i. discussion of the extraordinary costs to go to zero discharge for a very limited time period as compared with the now very low discharges being achieved without pretreatment.

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2. Commerce was very strong in support of industry and particularly the continuance of 1016 because of the fire problem. This is the first meeting on which we have had an indication of strong support for the continued use of 1016. Other comments of the Department were:

A 1016

a. EIA should continue to document the fire hazard potential and suggested interface with insurers was thought to be advisable;
b. Commerce itself will move strongly on the basis that the fire safety hazard alone outweighs the discontinuing usage of PCBS in capacitors;
c. Commerce would like to assist all in the capacitor industry in negotiating discharge permits as they are currently being imposed by EPA. Dr. Galler requests copies of correspondence with EPA on this matter.

d. Commerce would also like copies of any comments made to EPA concerning the Versar report. Commerce was not aware of this report but will obtain their own copy.

e. There is a fire safety group within Commerce itself and it has been suggested that EIA directly contact them. Ray Clark is handling this and hopefully a meeting will be established.

This was the first positive meeting with interested parties that your committe has had with any government agency. Not only was Commerce interested, but they were surprisingly well informed on the PCB situation and, in general, with all toxic chemicals. They have stated they will not only help us with EPA, but will also act as an interface with other agencies if we must go to an alternate impregnant that is flammable. As stated previously, they are quite vehement in their feelings that we should continue to use Aroclor 1016 in industrial and power capacitors.

Accompanying this memo are copies of letters sent to Commerce after the meeting. I also attach a letter from Elliot Richardson acknowledging my follow up letter of March 22. Another meeting with Commerce is planned.

Cordially,

Office of Environmental Affairs

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Miss Jane Lewis - " 202/377-4335
Dr. Vern Hartwell - " 202/377-2388
Mr. John Cox - " 202/377-2388

Office of the Secretary for Policy

Office of Energy Policy and Programs

Mr. Phil Drury - phone 202/377-5001
Mr. Ernie Loeb - " 202/377-4871

Office of Regulatory Economics and Policy
Mr. Bill Sullivan - phone 202/377-3725

Domestic and International Business Adm.

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