W. B. PAPAGEORGE - ST. LOUIS

November 11, 1970

EXHIBIT
Pf. No. 982
10-14-92

Letter Dated Oct. 27, 1970, R. F. Casey,
Ohio Edison to P. G. Benignus

P. G. Benignus

Below are my comments concerning Mr. Casey's letter.

1. Item 2 of Don Olson's letter was appropriate in February because there was no evidence that PCB's with lower chlorine content were being discovered in the environment. Since then, there has been increasing evidence that PCB's similar to Aroclor 1248 and Aroclor 1242 are being identified especially near industrial plant effluents. There is also evidence that these lower chlorinated materials are having adverse effects on some species of wildlife.

2. As you know a high percentage of the Aroclors we produced had a chlorine content less than 54%.

3. Testing of new formulations continues. MCS 1016 is an example of a formulation which reduces the more objectionable PCB's. Samples have been forwarded to capacitor customers for evaluation. We have not discussed the use of MCS 1016 in transformers. Perhaps a discussion should be held soon with Marketing, Research and Manufacturing.

4. Installation of the Krummrich incinerator is estimated to cost close to one-half million dollars. Installation of a properly designed and instrumented smaller unit may cost a quarter million dollars. To justify even the small unit, the quantity of askarel to be destroyed must be substantial. In my opinion very few of our customers will be able to justify an incinerator of their own.

5. Solid waste soaked with askarel can be safely destroyed with properly designed equipment which is also very costly. We are now getting ready to test the practicality of decomposition by pyrolysis, destruction of the resulting gases at high temperatures and scrubbing of the stack gases to absorb the HCl which is formed. The economics is not now known. I estimate that the cost to handle, ship and destroy solid waste will be discouragingly high. I recommend using properly operated landfills until they are declared illegal.

6. The capacitor manufacturers have discouraged the utilities from using landfills. I can understand their concern, which I suspect is legally motivated, but for the time being landfills are the only practical solution anyone has to offer.

I hope the above comments are helpful in responding to Mr. Casey's letter.

W. B. PAPAGEORGE

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