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April 14, 1976

Dr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
United States Department of Commerce
Washington, D.C. 20230

Dear Sid:

Please accept the thanks of not only the four individuals with whom you met on Friday, but also the entire EIA Subcommittee on polychlorinated biphenyls. The substantial group you assembled and the time you gave us are indicators of the concern Commerce has for this problem and the effort you are making to assist industry. As Ray Clark stated, we were all pleasantly surprised since this was the first intelligent meeting we have had with Government. More importantly, it was a meeting with individuals who have a total understanding of the problem. It is quite apparent that Commerce has as much knowledge of the PCB situation as EPA and this knowledge includes the effects a cessation of PCBs will have on industry-at-large. Obviously, we all hope that you and your organization will be able to help us ameliorate this situation with EPA. We agreed that there should be two plans of action.

The first is to try and convince EPA that it continue to allow the more biodegradeable 1016 to be used in industrial and power capacitors since the fire safety problem with an alternate impregnant may have a greater potential hazard on human life than the toxicological effects of PCBs. This is not going to be an easy task; even if EPA were to permit the continued use of this formulation, we would then have to convince Monsanto to make it available directly or via licensee.

The second plan concerns what must be done if the alternate flammable impregnants must be phased-in. Unfortunately, the time schedule for discontinuance of Aroclor 1016 is such that we must pursue both aspects simultaneously. Areas in which Commerce may

help us with alternate impregnants are:

1. assist in making governmental regulatory groups aware of the fire hazard and be willing to accept it;

2. assist, perhaps by NBS, in the development of a fuse or mechanical switch which would disconnect the capacitors from a circuit before explosion at the time of a short;

3. development of a subsidy for product liability insurance for manufacturers of capacitors.

We will keep your organization abreast of developments with EPA and look forward to another meeting within the next few months.

Cordially,

Clifford H. Tuttle
President

CHT/erb

P.S. We would very much appreciate a more comprehensive listing of the people who attended the meeting, including titles and telephone numbers.