

FROM

C. G. RITZERT

ENVIRONMENTAL AFFAIRS
PITTSBURGH OFFICE 19

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1992 December 21

7
Callister

RE: PCBs IN SIDING MATERIAL - UPDATE

Regulatory Issues:

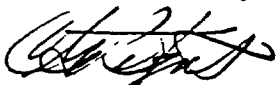
No response to our November 6 letter to EPA has been received, as yet. Reynolds has sent a similar letter. The PCB Consensus Group in which we are participating is going to issue a FOIA (Freedom of Information Act) request for any information EPA may have on the subject. Until or unless we learn more, this type of siding material (Galbestos and Robertson siding) should be handled as described in my November 4 memo, i.e. kept in good condition and disposed according to regulations based on PCB and asbestos content. We still have no reason to believe that this type of siding poses a hazard if it is in normal use.

PLAINTIFF'S
EXHIBIT
AL-1317

Testing:

New problems have been identified in the analysis of the coating from this type of siding by Analytical Chemistry Division at ATC. Once the material is dissolved in a solvent, the GC analysis is straightforward as long as the run is long enough to detect the higher chlorinated congeners being found in an Arochlor 1268 pattern. However, now that several different samples of this type of material have been analyzed, difficulties have been identified in handling the material prior to dissolution. In comparing different methods of sample pretreatment, replicate samples of the same siding material have yielded disparate results, e.g. < 10 and > 100 ppm on the same material. ANCH is working with Lee Blayden's group and with me to resolve the problems. Lab work is in progress and scheduled to be completed by early January. The analytical protocol will not be distributed until this work is completed. This work is being coordinated with the development of a sampling protocol by Margaret Egbe. Sampling this material is also not an easy task. I have just received a draft of that protocol. The package (both sampling and analysis procedures) should be ready for distribution by mid January.

Since we do not know exactly where this issue may go from a regulatory standpoint, I would appreciate being kept informed of any activities related to this type of siding, e.g. siding identified as PCB-containing, disposal plans, problems, etc. If I can be of any help on the subject, please call (8-225-2333)



Connie G. Ritzert

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