From : Prodelec

Courbevoie, 10 September 1975

Dear Sirs,

FRENCH REGULATIONS ON THE CONDITIONS FOR THE USE OF POLYCHLOROBIPHENYLS (PYRALENE)

The great stability of polychlorobiphenyls or PCB has given rise to fears on the part of ecologists regarding their accumulation in nature with unkown long-term risks for the environment. At their request the council of the OECD, as you know, recommended controlling and restricting the use of PCB's in 1973. The French regulations which appeared in the Journal Officiel of 26.7.75 (extract enclosed) makes these recommendations official. They confirm measures already taken by producers and the principal users of PCB.

You will know that these regulations,

1. Authorise (article 2) the use of PCB's in transformers, rectifiers, resistances, inductances, and large condensers as well as in certain hydraulic fluids and heat carriers without requiring special retention devices.

   The only obligations are :

a. The recovery of PCB's contained in rejected items (art. 6) whence (artc. 8) the requirement for a label giving appropriate information.

b. The possibility of supplying (art.9) at the request of the authorities a list of customers using PCB, i.e. buyers of transformers or other equipment containing pyralene.

2. Authorises the use of PCB's (art.3) in small condensers, that is to say those containing less than 1kg of PCB. There is no duty to recover the PCB but conditions are imposed as to the choice of PCB's. These conditions are satisfied with the pyralenes which we suggest for condensers (pyralene 1500 and 1501 -3010 and 3011-1460).

   The recovery of pyralenes from rejected equipment presents no problem as Profelec handles this and, as the case may be, destroys or regenerates it : We have applied for approval of us as a recovery body (art. 7).

   We cannot carry out the destruction of solid waste impregnated with PCB, as required at the end of article 3, but we have already contacted certain specialist bodies and if they have the

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