

August 6, 1974

Honorable Gerry E. Studds
Congress of the United States
House of Representatives
Washington, D.C. 20515

Dear Congressman Studds:

Your assistance in working with the Public Works Committee of the House is desperately needed. As we have previously written to you, certain proposed rulings that EPA has made will seriously affect the business of this company and others in this Commonwealth, who employ many thousands of workers.

We have great hopes that EPA is going to accept the fact that polychlorinated biphenyls, having five chlorine atoms or less, are biodegradable. If that fact is not accepted, this company and its competitors will be in great difficulty. This difficulty will spread upstream to the manufacturers of raw materials, the bulk of which is made in New England, and downstream to its customers, who produce high-efficiency lighting and high-efficiency air conditioning.

Monsanto has demonstrated the biodegradability of the material we use in manufacturing power factor correction capacitors. The present rulings, however, not only state that this material is non-biodegradable, but further impose on its discharge, a purity level that is currently unmeasurable. You may be interested to know that we do have equipment which, when used to evaluate the fresh water we receive from the City of New Bedford, indicates a level of PCB's that is significantly in excess of that permitted under the EPA proposed ruling on discharges.

I want to point out also that Thomas C. McMahon, Director of the Water Resources Commission concurs with our opinion and has so stated in a letter to us on March 19, a copy of which (attached hereto) was also sent to EPA and to the Office of Water Programs in Washington.

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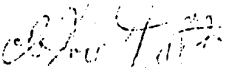
If we are unsuccessful in obtaining recognition of these facts in the final regulations that will be issued shortly, we urgently require an amendment to the law that will extend the Section 307 compliance period from one to three years. From correspondence received from Representative Silvio O. Conte, I understand he is prepared to support such an amendment.

Your attention to this matter is respectfully requested. I realize that, although this subject is vital to us, it risks being sidetracked by the Watergate issue and other important legislative matters. For our welfare, as well as that of many others in New England, we cannot let this happen. Please let me know if you have any questions.

Your co-operation and assistance is greatly appreciated.

Sincerely,

AEROVOX INDUSTRIES, INC.



Clifford H. Tuttle
President

CHT/eb
Attachment

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