UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE ADMINISTRATOR

Dear Mr.

For at least five years, the Federal Government and the manufacturing industry have been aware that polychlorinated biphenyls (PCBs) pose a threat to human health and the environment. Last month, at EPA's National Conference on Polychlorinated Biphenyls in Chicago, leading experts clearly documented the fact that PCBs are pervasive in the environment, are endangering many wildlife species, are creating a serious potential health hazard to the public and are causing considerable disruption and economic harm to commercial fishing in many areas. While certain voluntary measures have been initiated in the past, the widespread and persistent occurrence of PCBs underscores the failure of existing practices to adequately control the escape of PCBs into the environment.

Today I announced a broad EPA program of regulatory and nonregulatory actions (copy enclosed) to reduce the levels of PCBs in the environment. Because our ability to reach PCBs already in the environment is extremely limited, we must concentrate our efforts on preventing additional PCB contamination from the estimated 300 million pounds of PCBs currently in use and inventory, primarily in closed electrical and hydraulic equipment, and the approximately 40 million pounds of new PCBs that are introduced into commerce each year.

In this regard, I recognize that the manufacturers and users of electrical and other equipment containing PCBs have taken steps to limit the discharge of PCBs into the environment. The guidelines that the National Electrical Manufacturers Association and others issued under the auspices of the American National Standards Institute last January represent a good start in developing industry standards for good housekeeping, labeling, and other practices to minimize release of PCBs. I believe, however, that these guidelines need to be strengthened and expanded if they are to be effectively employed to virtually eliminate the escape of PCBs into the environment. Therefore, I am pleased to learn that the industry is scheduled to revise these guidelines over the next several months. I strongly encourage the vigorous pursuit of this undertaking. EPA will be glad to assist in any way it can in this

effort. My staff will be participating in the meeting to be held in Chicago on January 13, 1976, to suggest areas for amendment to strengthen and broaden the present guidelines and will be available to help draft specific guidelines in the coming months.

Strengthening of the guidelines, however, is only the first step in controlling and managing the use of PCBs. The ultimate step is to put these guidelines to use in operating and procurement practices. The proper labeling, transportation, maintenance, repair, and ultimate disposal or salvaging of PCB-contaminated wastes and PCB-containing equipment is essential to minimize environmental harm. Accordingly, I am asking each of you to personally initiate an examination of your company's operating and procurement practices to assure that they comply with the current guidelines and are otherwise environmentally acceptable. I am further asking you to commit your company to correcting these practices where they are found deficient and to implement fully the revised guidelines after they are issued.

Recognizing the impossibility of designing any procedures which will fully guarantee that no PCBs will enter the environment, I have concluded that the industry must develop alternatives for PCBs and ultimately phase out all uses of these chemicals. I recognize that alternatives cannot be developed overnight and I am aware that the environmental impacts of all potential alternatives must be carefully examined and properly weighed. Nevertheless, I believe it is essential that your industry commit itself to a deliberate and expeditious search for alternatives.

I would like to discuss these matters with you. Therefore, I am inviting you to meet with me on January 22, 1976. It is my hope that if we work together we can accomplish our common goals of eliminating present practices which result in environmental contamination and of making progress in finding alternatives for the future.

If you have any questions concerning the arrangements for this meeting, you may contact Dr. I.E. Wallen, (202) 755-6956.

Sincerely yours,

Russell E. Train

Enclosure

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