PRIVILEGED AND CONFIDENTIAL
DRAFT (5/13/87)

BY HAND

Mr. J. Winston Porter
Assistant Administrator for
Solid Waste and Emergency Response
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: EPA's Proposal to Adjust Reportable Quantities, Docket No. 102 RQ-273C

Dear Mr. Porter:

Enclosed are the comments of the Chemical Manufacturers Association (CMA) Program Panel on PCBs on EPA's proposal to reduce the reportable quantity for PCBs from 10 to 1 pound. As described in these comments, CMA does not believe this reduction is justified in light of the comprehensive scientific evidence indicating PCBs do not remain in the water column when spilled. Accordingly, failure of EPA to consider the extent to which PCBs adsorb to sediment, solids and organic matter in setting a reportable quantity leads to an unduly low number.

We urge that the Agency give serious consideration to the scientific evidence presented in our comments and, accordingly not lower the reportable quantity for PCBs.

Respectfully yours,

Geraldine V. Cox
Vice President -
Technical Director

cc: Dr. K. Jack Kooyoomjian (WH -548B)
Superfund Docket Clerk

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