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To: Timothy S. Hardy, Esq.

KIRKLAND & ELLIS

From: Morrison & Foerster

7-14-92 12:28pm

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Via Facsimile: 202/457-8411

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USWAG
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Washington, D.C. 20004-2696

Re: PCBs/Prop. 65 Rulemaking

Gentlemen:

Enclosed please find an as filed copy of a brief Comment on Cal EPA's proposal to find that up to a .09 micrograms/day exposure to "PCBs" poses no significant risk under California's Prop. 65. As you can see, the Comment does not take on the issue of what the right number should be, but merely attacks the proposal's failure to distinguish among PCBs, reiterating NEMA's and USWAG's position dating back to 1987.

Your comments and suggestions on the earlier draft were appreciated. ??

Yours very truly,

Robin M. Shapiro

Robin M. Shapiro

RMS/ksc

cc: Steve Rosenthal, Esq. (MoFo D.C.) (via fax)
NEMA/USWAG PCBs Working Group (via fax)

Enclosure

850350

For Distribution by CMA
CHEMSTAR DIVISION

From E. Fest. Waters
Ref. No. PCB 7/92-027
Date 7/28/92

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