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June 27, 1974

P. Wright
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Polychlorinated Biphenyls Draft Criteria
Received from C. H. Thompson

W. B. Papageorge

Here are a few comments on the PCB documents for whatever they are worth.

1. Criteria: -

   The proposed criteria for aquatic life is 0.001 ug/liter in fresh water as compared with 0.002 ug/liter which is a 50% reduction from the unsatisfactory Water Quality Criteria Document and the statements on Page 4 do not justify 0.001 ug/liter. Obviously, they are using Mel Veith's numbers without question. This is a wild misapplication of alleged data but I don't know how to attack it.

2. I will not attempt to critique the analytical methodology or toxicology referenced or reported. This can be done by Scott Tucker and Paul Wright who are far better qualified.

3. P. 1-Paragraph 1. The statement that the first two digits in an Aroclor number "represent the molecular type are not true, e.g. 1242 is a biphenyl type as is 1016. It used to mean 11 was crude biphenyl Aroclor and 12 was refined biphenyl Aroclor. However, as the product line has evolved, the numbers are now without meaning.

4. P. 1 - Paragraph 3. I believe we should attack the general statement "and highly resistant to both heat and biological degradation". Our position can be that some chlorinated biphenyls are highly resistant to biological degradation (5 Cl and above) while the lower chlorinated materials readily degrade. We must establish this point if we are to get a reasonable effluent limitation number.

5. P. 2 - Paragraph 1 - Suggest a sentence be inserted after the sentence which ends "by the producer" as follows: "These were the applications which permitted PCB compounds to enter the environment."

6. P. 2 - Paragraph 2. Suggest the word adverse be deleted. Then add a sentence as follows: "The magnitude of these environmental effects varies widely depending to some extent on the chlorine content of the PCB."

7. P. 2-Paragraph 4 and P. 3-Paragraph 1 - Based upon its wording, it would seem that the part of this paragraph pertaining to dibenzofurans is highly speculative and should be omitted.

8. P. 3 - Paragraph 2 - Has no relationship to the problem at hand. It was an accident that should not repeat.

9. P. 4 - Paragraph 2. 194 samples are not adequate to estimate the PCB content of the U. S. population. Should be omitted.

10. P. 4 - Paragraph 3 - Obviously the bio-accumulation factors shown are excessive and not justified by controlled tests.

11. P. 4 - Paragraph 4. The FDA guideline for fish of 5 ug/g is an arbitrary selection as we know.

12. PP. 5-6-7-8 - These pages appear to be excerpts from the testimony of Dukes, Veith, and Nebeker which the judge ruled out at the toxic substances hearings. How can they establish criteria based upon testimony that the hearing officer would not accept and that was no part of the toxic substances testimony.

Bill, I believe we should get together and try to rewrite this Criteria Draft Document as soon as possible.

D. B. Hosmer

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