

INCIDENTAL PCB'S

SUMMARY

EPA has stated that they plan to regulate "incidental PCB's" generated at levels of 50 ppm or less in chemical processes.

CMA surveyed its membership and concluded that only about 13,800 pounds per year of PCB's are generated by respondents, believed to account for 1/3 of all chemical industry sales and a significantly larger fraction of all chlorinated chemical sales/production. Of this 13,800 pounds per year, all but 5% (~660 pounds) are disposed of in EPA approved facilities, i.e., incinerators, landfills, etc.

Of the total incidental PCB's generated, about 90% are the "non-commercial" mono- and dichlorobiphenyls which readily biodegrade in the environment in a few weeks.

The 660 pounds per year of incidental PCB's not disposed of at time of manufacture exist as either chemical intermediates and industrial compounds or are encapsulated in commercial products such as polymers and paint films. None of these uses or products pose any significant exposure risk to the public, workers or the environment.

This 660 pounds per year of incidental PCB's EPA proposes to regulate is innocuous in that it poses no significant risk nor added burden to the environment or populace. Currently, about 750 million pounds of "old" PCB's are still present in the environment and 350 million pounds of these are authorized by EPA for use in electrical equipment. EPA authorizes this continued use in their new proposed regulations, while recognizing that approximately 600,000 pounds of PCB's annually leak into the environment from this equipment.

To further put this issue in perspective, note that the quantity of PCB's likely to be generated between now and the year 2000 would be less than 1/2 of 1% of the current environmentally free PCB's expected to biodegrade during the same period.

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