memo / MENASHA CORPORATION

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SUBJECT: EPA Conference on PCBs.

FROM: Jim Schedgick

On November 19-21, 1975, the EPA conducted a conference on PCBs at the Pick-Congress Hotel in Chicago.

Numerous technical papers were presented on the first day of the meetings. These scientific papers were straight forward, unemotional and non-political. A number of these papers were a more detailed repeat of statements entered in the record of the DNR hearings in Madison, Wisconsin on August 28-29, 1975.

PCB's

PCB toxicity has stirred an interest in Technical minds to the extent that just about every area in the enviornment has been examined for PCBs.. Research has begun in such areas as toxicology, studies of the Biphenyl molecule, degrees of toxicity in relation to substitution of chlorine on Biphenyl, Carcinogenic effects, concentration of PCBs in animal and human adipose tissue, and investigating the current practices for disposal of PCBs. From the above research a new class of toxic compounds were found in the environment. The compounds are TCBF (the tetra chlorinated dibenzofurans). Some researchers now think PCBs perse'aren't so bad after all, it's TCBF which can be a contaminate in PCB that is the culprit.

In all the toxic chemical and biological research papers, Aroclor 1260 was the most studied, followed by Aroclor 1254. Aroclor 1260 hasn't been manufactured in the USA for many years and we do not know the quantity of 1260 in the world environment. This author seriously believes that the amount of 1260 in the environment is extremely small. Out of the Aroclor 1260 studies, the investigators arrived at many conclusions concerning the toxic levels and effects of lower chlorinated biphenyls. Overall, more research is required and the PCB delimma should disappear by the year 2025.

EPA STATEMENTS AND DISCUSSIONS

The EPA feels caught in the middle of the PCB delimma. There is pressure on EPA by Congress and other government agencies, especially the Dept. of Interior, to establish guidelines for PCBs in industrial effluents. EPA is in a turmoil in trying to establish guildelines because the public demands reasonable regulations which will not cause economic chaos. EPA is being forced to establish some regulations by February, 1976. At this time EPA may lean toward a voluntary effort on the part of industry to comply with a recommended PCB discharge limit. The 1 ppt limit is already unreasonable because the lowest level found the the environment is 10 ppt. EPA made no recommendations or commitments at the Chicago meeting. EPA is fully aware that a regulation must be reasonable in order to be meaningful. This author believes there will be a ban on the imports of PCBs. There will also be strict inventory and usage controls on the USA production of PCBs.. For the Paperboard Industry, there may be some PCB discharge limitations with no federal enforcement policy. Board mills may be required to supply EPA with PCB discharge data.

EPA Conference on PCB's .. continued

SOURCE OF PCB'S THAT CONTAMINATE THE ENVIRONMENT

Mr. T.E. Kopp of the EPA discussed the sources of PCB pollution. The major sources of contaminations are spills, disposal of waste PCBs and aerial fallout. Most spills are accidental and occur from Railroad Tankers, Tank Trucks and when workmen remove or damage plugs in Electrical transformers. Power generating companies dispose of the low dielectric strength PCBs by sale to an oil company. The oil companies blend the PCBs with waste tar products. The PCB-tar solutions are sprayed on public roads for dust control. One Michigan Utility Company blends waste PCB with light oil and uses the solution for dust control in their parking lots.

PCBs also enter the air from evaporation and the burning of materials containing PCBs. Aerial fallout is the transport mechanism for PCB distribution and the reason for high concentrations in non-industrial areas. During the last winter season, snow samples in the Milwaukee-Racine area contained 14 ppm of PCB. PCBs are even found in the snow layers of Antarctica.

There are minor sources of PCB pollution which are related to personnal hygiene. Such is the case in electrical plants where transformers and capacitors are filled with PCB.

JJS:cp