State

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

L. P. Voigt
Secretary

BOX 450
MADISON, WISCONSIN 53701

IN REPLY REFER TO: _____

September 11, 1975

Mr. Arthur T. Hart
Director of Field Services
National Agricultural Chemicals Assn.
1155 Fifteenth St., N.W.
Washington, D.C. 20005

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SEP 15 1975
BY _____

The Governors' Great Lakes Regional Interdisciplinary Pesticide Council has reviewed the issue of PCB contamination of waters and foods. The Wisconsin Departments of Natural Resources and Health & Social Services have participated in these discussions. In addition, both departments have participated in the Environmental Protection Agency Regional Conference and Wisconsin Department of Natural Resources public hearings concerning the use and discharge of PCBs. Both departments concluded that the use of PCBs should be eliminated or at least restricted on the basis of essential need and an ability to prevent environmental contamination. The two Wisconsin Departments therefore propose the attached resolution for consideration at the September 18, 1975 meeting of the Interdisciplinary Pesticide Council.

I would request that you offer a position for your agency at that time. Represented nonmember agencies may enter their position, which will be advisory. The position of the Council will of course only be advisory to the respective State Executives.

Sincerely,
Division of Environmental Standards

Lloyd A. Lueschow, Chief
Laboratory Services Section

LAL:pmm
Attach.

Bill Simmons
608-266-7135
Contact official
in Trial Wis.

MONS 093970

THIS IS 100% RECYCLED PAPER

WHEREAS, the Lake Michigan Toxic Substance Committee of the EPA has reviewed the most recent toxicological and analytical data and has concluded that:

1. The effect level of PCBs in primates reproduction has been recently documented as less than 2.5 ppm and is much lower than has been observed in Standard test mammals (rats).

2. As a result of recent court decisions, the FDA is now enforcing the 5 ppm residue maximum in fish intended for human consumption and is likely to review the 5 ppm maximum allowable based on recent primate toxicological evidence.

3. The concentrations of PCBs in Lake Michigan fish are probably not decreasing and salmonids, particularly larger specimens, currently exceed the 5 ppm maximum allowable levels.

4. Reported efforts by the manufacturer to restrict distribution and efforts by the agencies to restrict discharges have not resulted in PCB reductions in the lake.

5. It is probable that wastewater sources of PCBs to Lake Michigan are ubiquitous, and at or below detectable levels.

6. An economic loss has already resulted to the commercial fishery as a result of PCB contamination. A much larger economic loss to the commercial and sport fishing industry is imminent in light of current FDA food recommendations and enforcement actions.

7. Non-Wastewater PCBs are still reaching the environment from incineration, land disposal and careless dumping.

8. The presence of PCBs in many processes and products continues to be widespread in spite of the Monsanto Chemical Company policy to restrict sale to closed systems.

9. Many uses of PCBs can be eliminated or replaced by using alternative chemicals, and

WHEREAS, both domestic and foreign PCB pose an environmental hazard, and

WHEREAS, current industry efforts to regulate PCBs have not proven effective in reducing environmental contamination, and

WHEREAS, recent analytical data establishes beyond reasonable doubt that PCBs are contaminating the environment as a result of nonessential uses, and

WHEREAS, virtually every use of PCB is replaceable by an alternative product or engineering design,

NOW THEREFORE BE IT RESOLVED THAT, member agencies represented in The Governors' Great Lakes Regional Interdisciplinary Pesticide Council seek Legislation or Administrative Rules to ban all uses of PCBs other than those uses considered essential after public hearing by appropriate legislative committee or regulatory agency.