MAR 2 5 1974

Westinghouse Electric Corporation

Westinghouse Building
Gateway Center
Pittsburgh Pennsylvania 15222

March 21, 1974

Mr. Phocion S. Park
Monsanto Company
800 North Lindbergh Boulevard
St. Louis, MO 63166

Dear Mr. Park:

Subject: Proposed Toxic Pollutant Effluent Standards for Polychlorinated Biphenyls

It has come to my attention that the copy of testimony submitted to you in the above-captioned matter may have lacked Page 9 of the testimony submitted to EPA. Please insert the enclosed, if necessary.

Very truly yours,

N. W. Smith, Jr.

Norman William Smith, Jr.
Attorney for
Westinghouse Electric Corporation

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economy has been examined and does not appear to be great". Neither references nor further justification is given.

The EPA staff provided an undated, unauthored document entitled PCB's which presents rudimentary calculation on relationships between allowable concentrations in edible fish, residual levels in fish eggs through reconcentration factors to concentrations in waters. The reference given is "Water Quality Criteria" which is only available in a limited supply. This document in turn references, "Water Quality Criteria of 1972", an NAS Report in press. Copies were not available for public use as late as March 6, 1974 and to our knowledge are still not publicly available.

C. Consideration of Alternatives

Alternatives and their consequences are not presented.

D. Cost/Benefit Analysis

We can find no evidence of a cost/benefit analysis. There is no benefit that will result from the proposed standard that will not equally result from our proposal. In contrast, the economic and social cost to the industry and the nation resulting from the proposed standard would be many orders of magnitude greater than the costs already incurred which have largely brought the PCB effluent problem under control. In cost benefit terms, therefore, the proposed standard cannot be justified.

E. Summary

Without these analyses substantiated by references, the proposed standards are arbitrary, capricious and contrary to the laws of the land.