SUBMISSION TO

THE SUBCOMMITTEE ON OVERSIGHT AND INVESTIGATIONS

OF

THE COMMITTEE ON INTERSTATE AND FOREIGN COMMERCE

U. S. HOUSE OF REPRESENTATIVES

By

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1. HISTORY OF MONSANTO PRODUCTION AND SALES OF CHLORINATED BIPHENYLS

Monsanto entered the chlorinated biphenyls business in 1935, when it purchased the Swann Chemical Company. Production and distribution increased until the early 1970s, when, in response to reports of its presence in the environment, Monsanto restricted sales of chlorinated biphenyls. In 1977, the company ceased production and distribution of chlorinated biphenyls in cooperation with the electrical industry. Chlorinated biphenyls were banned (except for certain applications) in the U.S. in 1979.

Sales and Distribution

The chemical structure of the polychlorinated biphenyls has been known for nearly 100 years. Commercial production of these materials was initiated in 1929 by the Swann Chemical Company in response to the electrical industry's need for improved dielectric insulating fluids which would also provide increased fire resistance when used in transformers and capacitors. (See para. 2, page 2 of the Interdepartmental Task Force on PCBs report, "Polychlorinated Biphenyls and the Environment," May 1972 - Attachment 1-1.)

As the unique functional characteristics of these materials became more fully understood, additional uses were found. Their fire resistance made them an excellent choice in high pressure hydraulic applications associated with high risk of fire such as die casting and steel production. Their thermal stability and fire resistance were valuable in heat transfer systems.

Their stability, low water solubility, low vapor pressure and solvency power made them attractive in carbonless paper systems. Their fire resistance, thermal stability and viscosity characteristics made their use desirable in hot melt adhesives and other plasticizer applications.

Chlorinated biphenyls, therefore, evolved as a unique class of chemicals which met important needs for both industry and society. In some instances, fire and building codes required the protection of life and property offered by chlorinated biphenyls. It was within this framework that Monsanto and other producers developed a growing worldwide business for these versatile products. For a retrospective discussion of the benefits of chlorinated biphenyls, see Attachment 1-2.

The following charts show the data for chlorinated biphenyls through Monsanto's voluntary phaseout program to termination of production and sales in 1977. Significant points in these charts are:

a. Heat Transfer -- Between 1970 and 1972, a task force of Monsanto engineers worked closely with customers to replace chlorinated biphenyl fluids with materials of equivalent thermal stability but with unavoidable lower fire resistance. Phaseout was completed in 1972.

b. Hydraulic Fluid -- Development of replacement fluids began in 1970, and sales of chlorinated biphenyl-based fluids were discontinued in 1971.

PCB MANUFACTURING AND SALES
MONSANTO INDUSTRIAL CHEMICALS COMPANY
1957 thru 1978
(Thousands of Pounds)

	1957	1958	1959	1960	1961	1962	1963	1964	1965	1966	1967	1968	1969	1970	1971	1972	1973	1974	1975	1976	1977	1978
U.S. PRODUCTION	(1)	(1)	(1)	37919	38615	39363	44734	50833	60469	61840	75389	62084	76389	69684	45417	38889	42178	48118	29710	29992	13339	4
DOMESTIC SALES	32299	28061	31316	35214	37539	38043	39132	44869	51798	58079	62469	65116	67184	73881	34391	32242	37742	34898	25611	24329	12791	4
U.S. EXPORT SALES	(2)	(2)	(2)	(2)	(2)	(2)	3547	4099	4734	6852	9134	11231	10824	13951	10849	6388	8548	5795	5713	4744	1548	0
DOMESTIC SALES BY CATEGORY																						
Heat Transfer	0	0	0	0	0	157	582	999	1237	1798	2263	2529	3058	3058	3099	752	0	0	0	0	0	0
Hydraulics/ Lubricants	1812	1540	2088	2020	4198	2015	3045	4376	6010	4258	6042	5798	6878	7483	4563	0	0	0	0	0	0	0
Misc. Industrial	784	758	1088	1998	2114	7881	1528	1882	1841	1778	1428	1283	8878	1827	1195	0	0	0	0	0	0	0
Transformer	12956	9748	8884	7821	8881	7884	7288	7867	8887	8978	11871	11585	12888	13888	11134	11914	14178	12784	12782	8888	1817	0
Capacitor	17828	14888	18488	18887	18888	15388	15888	18548	23748	28884	28783	29588	25822	28788	14141	38178	23888	23812	13548	18327	11884	0
Plasticizer Applications	(1)	3878	4573	6244	3888	8824	9184	18237	11898	13481	13381	14488	18488	18537	3258	0	0	0	0	0	0	0
Petroleum Additives	0	0	0	0	0	0	0	0	0	0	0	0	1438	0	0	0	0	0	0	0	0	0
DOMESTIC SALES BY PCB GRADE																						
Aroclor 1221	23	18	254	183	88	148	384	888	388	538	442	138	887	1478	2215	38	38	57	38	38	0	0
Aroclor 1232	188	113	348	188	288	284	73	18	7	48	28	88	273	888	181	0	0	0	0	0	0	0
Aroclor 1242	18273	18444	13888	18788	18887	28884	38518	23871	31838	38857	43888	44858	45481	44888	21881	5837	8288	8887	8438	4418	51	0
Aroclor 1248	1778	2538	2284	8882	4888	3488	8813	5238	5888	3815	4784	4884	8288	4873	313	0	0	0	0	0	0	0
Aroclor 1254	7481	8881	8754	8888	8884	8385	8811	8888	7738	7825	8888	8881	8822	13421	4881	8118	2878	8185	8328	1884	1588	0
Aroclor 1260	7587	8852	8618	7238	8548	8885	7838	8538	5831	5875	8418	5253	4438	4888	1738	418	0	0	0	0	0	0
Aroclor 1262	31	184	388	338	381	432	414	442	538	788	848	728	818	1882	1	0	0	0	0	0	0	0
Aroclor 1268	0	72	182	188	188	348	284	188	188	284	387	288	588	388	0	0	0	0	0	0	0	0
Aroclor 1016	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2384	28158	23531	21955	12828	18387	11884	1

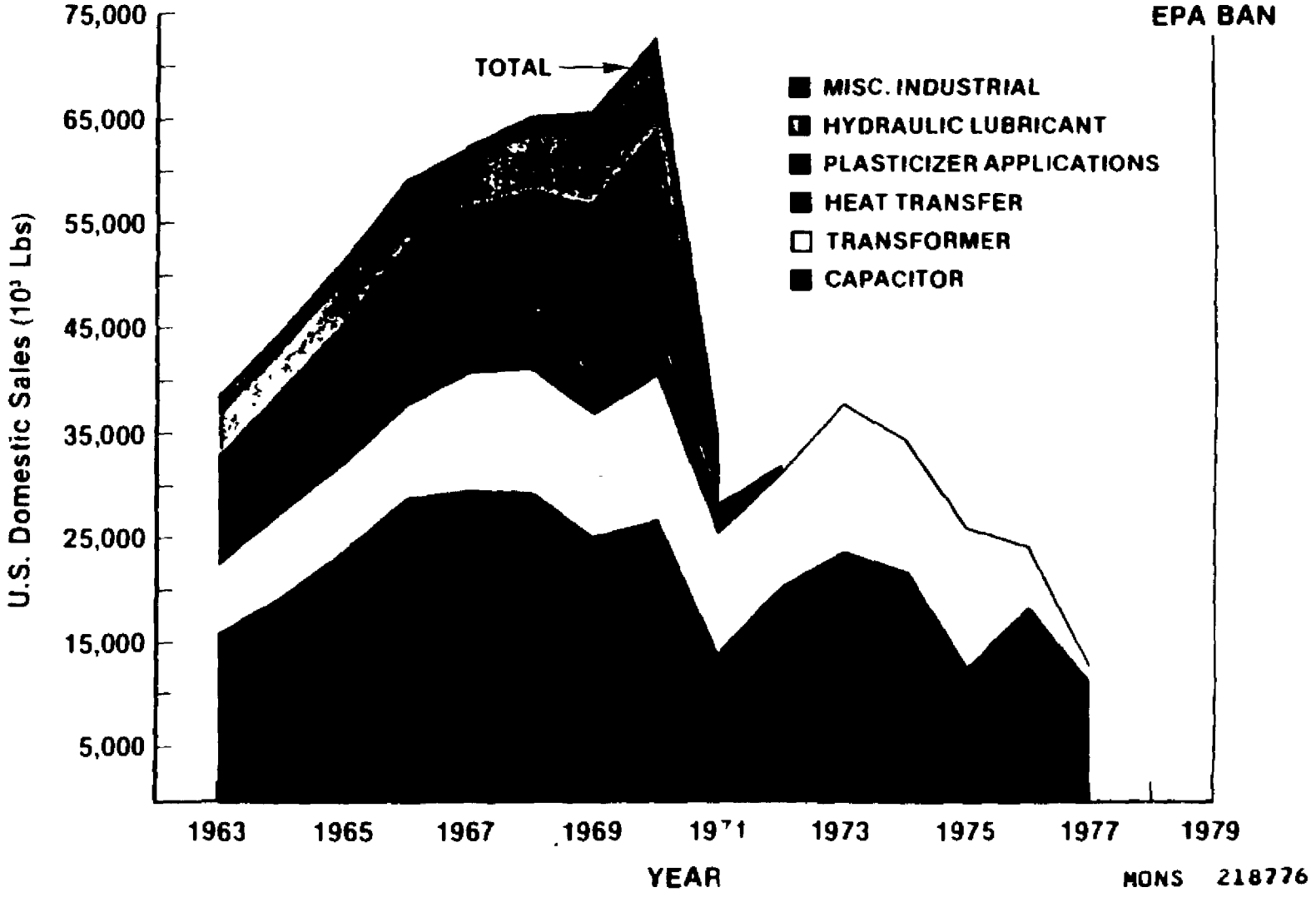
(1) Production data reported only in aggregate amounts beginning with 1959. Individual figures prior to 1959 estimated.

(2) Export sales data reported only in aggregate amounts beginning with 1959. Individual figures prior to 1959 estimated.

MONS 218775

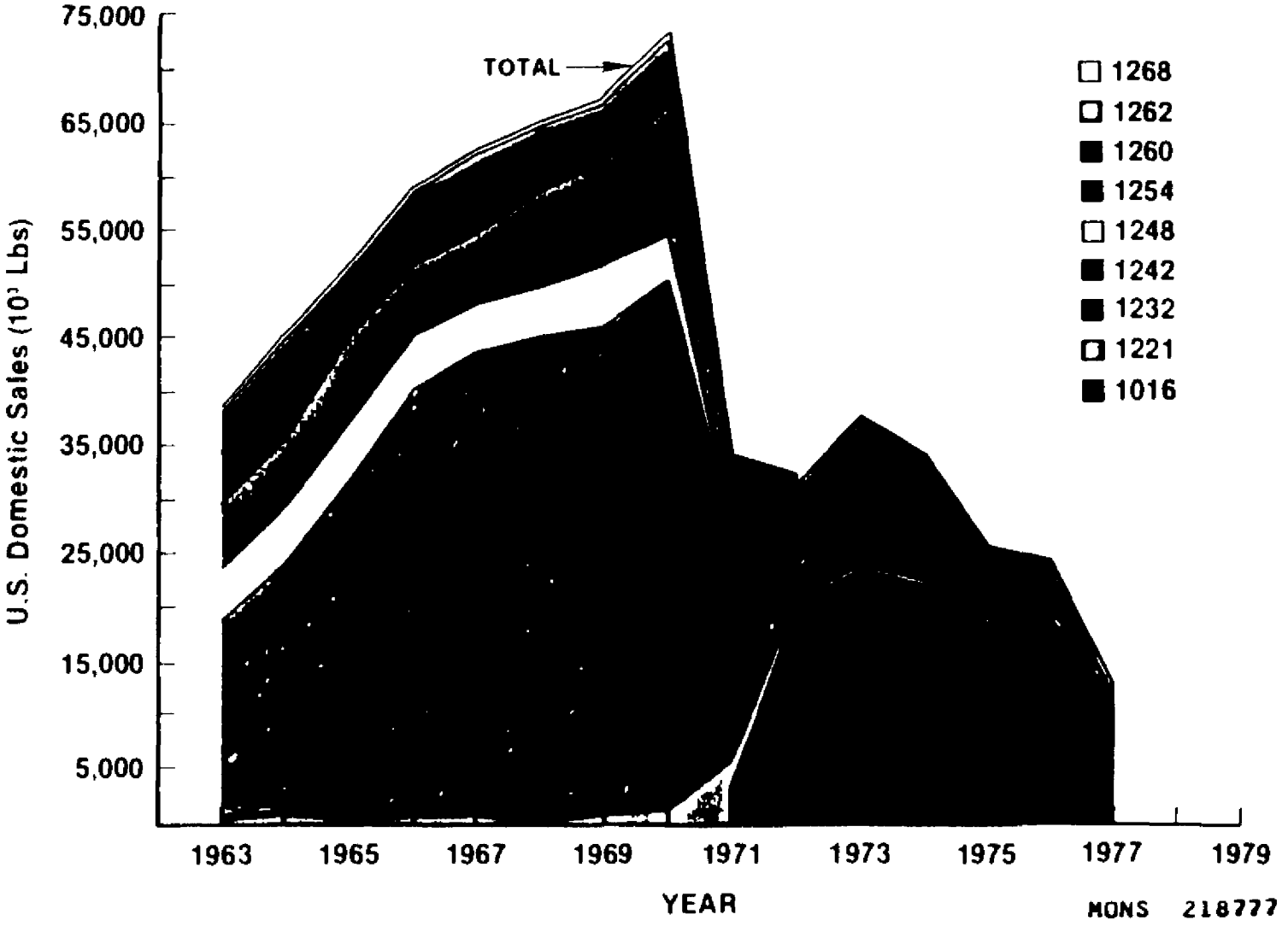
U.S. DOMESTIC SALES OF PCBs BY CATEGORY

(The Uppermost Curve Represents The Total Sales.)



U.S. DOMESTIC SALES OF PCBs BY GRADE

(The Uppermost Curve Represents The Total Sale)



c. Plasticizer Applications -- Sales of most chlorinated biphenyl plasticizers were terminated in 1970, with phaseout completed in 1971.

d. Miscellaneous Industrial Uses (such as vacuum pump fluids) -- Sales ended by 1971.

These voluntary restrictions resulted in a 64 percent reduction in Monsanto sales of chlorinated biphenyls from 1970 to 1972.

However, termination of sales for dielectric uses would have resulted in severe economic and social dislocation. This was recognized by the federal Interdepartmental Task Force on PCBs which concluded in 1972 that "Their continued use for transformers and capacitors in the near future is considered necessary because of the significantly increased risk of fire and explosion and the disruption of electrical service which would result from a ban on PCB use." (See para. 6, page 4, of Attachment 1-1).

Therefore, Monsanto agreed to continue supplying the products to manufacturers of electrical power distribution equipment who use chlorinated biphenyls only in sealed systems such as capacitors and transformers. In continuing to sell to such customers, however, Monsanto required assurances that the materials would be safely handled and properly disposed of.

In making this decision Monsanto believed 1) that entry of chlorinated biphenyls to the environment could

be effectively limited and controlled by users (see Attachment 1-3, Westinghouse report presented at the January 3, 1972, meeting of the National Industrial Pollution Control Council), 2) proper maintenance and decommissioning practices could limit fluid escape from transformer operations, and 3) withdrawal from production for these applications would have stopped production of equipment essential to the safe and efficient distribution and use of electrical energy. In addition, a more biodegradable lower chlorinated product (AROCLOR®1016) had been developed by Monsanto for use by the capacitor industry (see Attachment 1-4).

Steps Taken in Labeling and Transport Practices for Ongoing Dielectric Sales, 1972-1977

Monsanto shipped PCB fluids in both bulk carriers and in drums. Bulk shipments were made in Monsanto-owned railroad tank cars, which were used exclusively for that service, or in customer-owned tank trucks. Drum shipments were made in special reinforced drums. A multilingual warning label was affixed to each package giving a brief description of the nature of the contents and appropriate actions to be taken in the event of a spill or leak. We also supplied a label to be used on return shipments for incineration, which gave similar information.

Industry Guidelines

In June, 1970, the Board of Directors of the Power Equipment Division of the National Electrical Manufacturers Association appointed a committee to review the chlorinated

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biphenyl situation as it affected electrical usage. As a result, in April, 1971, American National Standards Committee C107 was established to develop guidelines for the safe use, maintenance and disposal of askarel* and askarel-soaked materials used in electrical equipment. Monsanto participated in this committee. A final draft was completed by November, 1972, and the Standard Guideline was published in 1974 as ANSI C107.1-1974 (Attachment 1-5).

Monsanto's Withdrawal from the Chlorinated Biphenyl Business

When Monsanto decided in 1970 to restrict sales of chlorinated biphenyls, there were no satisfactory alternate materials for closed-system dielectric uses. This view was later affirmed by the EPA. At least as late as a 1975 press conference, the EPA reiterated it would not ask Monsanto to stop production because that would shut down the electrical power industry and the railroads in short order. The EPA objective was to find a way to proceed without shutting down the country. That was precisely the objective to which Monsanto had been committed since 1970.

The problems encountered in replacing chlorinated biphenyls were rooted in their unique fire resistant and dielectric characteristics and in their role in electrical and industrial applications for 45 years. The challenge facing the electrical industry was to replace chlorinated

* "Askarel" is a generic name for fire resistant dielectric fluids, including those which contained polychlorinated biphenyls, made to meet specifications set by transformers and capacitor manufacturers.

biphenyls in an orderly manner, without creating other hazards of equal or potentially greater magnitude, and at the same time avoiding serious power and transportation disruptions.

Monsanto expended considerable effort and money in major research programs aimed at developing environmentally compatible replacement fluids for the electrical industry. The level of this research was greatly reduced in 1976 when the electrical industry developed the technology to adapt other compounds to its needs. It now appears the ongoing demand for liquid-cooled transformers will be satisfied by using silicone compounds. In the capacitor industry, the trend has been toward materials such as phthalate esters.

In adopting these substitutes, the electrical industry has been forced to accept lower fire resistance. New safety devices have been required to ensure that replacement equipment will not lead to increased risk to society from fire hazards.

In our press statement of October 5, 1976, Monsanto said we would complete distribution of all inventories and withdraw from the chlorinated biphenyl dielectric business by October 31, 1977. In making the announcement, Monsanto said the company would have targeted an even earlier shutdown date had transformer and capacitor manufacturers' conversion timetables permitted. All chlorinated biphenyl production was halted by Monsanto in July, 1977, and all customer shipments were completed by September, 197[illegible]

At the time we stopped PCB production, Monsanto established policies which precluded licensing of chlorinated biphenyl technology and restricted sales of biphenyl to uses which would not involve halogenation.

PCBs continue to be manufactured by other firms in Germany, France, Spain, Italy and certain eastern European countries. They continue to be widely used throughout the world.

Reasons for Monsanto Phaseout

Scientific knowledge about the presence of PCBs in the environment, and about its possible significance, began to evolve during the late 1960s (see, e.g., Attachment 1-6). That evolutionary process, which is still incomplete, began with two events--one in Japan and the other in Sweden.

In 1968, about 1,000 people in Japan became ill from eating rice oil heavily contaminated with Japanese-produced PCBs as a result of an industrial accident which has come to be known as the Yusho incident. The level of PCB contamination in the rice oil was 2000 to 3000 parts per million, extremely high concentrations. Conclusions about that incident have been clouded by the unknown impact of impurities in the Japanese PCB concerned (see pages 160-167, Attachment 1-7). However, the incident sounded a cautionary signal.

In Sweden, Soren Jensen, using new analytical technology to investigate DDT residues in the environment, reported the possible presence of PCBs in fish tissue. Monsanto and others began immediately to study the Swedish work, following preliminary news media reports in late 1966.

Before the findings could be confirmed or duplicated in the U.S., analytical methods had to be refined in order to definitively separate PCBs from other chlorinated hydrocarbons that were known to be present in the environment. New techniques were required to enable researchers to detect these chemicals in the low parts per billion ranges being reported.

The presence of PCBs in the environment in the U.S. was confirmed by 1970, but little was known about their potential impact. Because PCBs were reported in the environment and tests indicated they could accumulate in the food chain, Monsanto voluntarily decided to terminate sales of chlorinated biphenyls to open applications -- those which could result in losses to the environment. Plasticizer and carbonless paper applications fell into this category.

Because of the contamination of rice oil in Japan, food processors using Monsanto's chlorinated biphenyl heat transfer fluids were advised to change to alternative heating methods and Monsanto reemphasized the need for improved monitoring of finished food products to preclude contamination by any heat transfer fluid. The decision was made in 1971 to terminate all heat transfer fluid sales of chlorinated biphenyls, substituting other products with equivalent thermal stability.

High operating pressures cause hydraulic systems to leak. Monsanto therefore alerted users to manage wastes

to eliminate PCB discharge to the environment. As new hydraulic fluids were developed in 1971, we terminated sales of those containing PCBs.

As described earlier, Monsanto agreed with the electrical industry and government that the benefits to society of continued chlorinated biphenyl dielectric use outweighed the low risk of uncontrolled release from these sealed applications. The key to managing the risk was sound maintenance practice and disposal control.

With particular reference to the use of PCBs in human food and animal feed processing facilities, the FDA proposed usage regulations in 1972, which were adopted in 1973, and continue in force today (21 CFR §§109.15; 110.40(b); 500.45).

Although a variety of effects of PCBs has been postulated from research of widely varying quality, there is no evidence of environmental levels of PCBs being a major human health hazard. However, it became apparent that the public perceived risks associated with continued PCB dielectric use and preferred to forego its undoubted functional benefits. Therefore, in October of 1976, we advised dielectric customers that it was our intent, consistent with their progress with substitute products, to terminate chlorinated biphenyl production and sale by October, 1977. Each of them forecast how much product would be required to effect an orderly technical transition. In 1977, we made sufficient dielectric chlorinated biphenyl to satisfy the forecast transition demand and made final

shipments in September. The small residual inventory was incinerated in our pyrolysis unit, bringing to a close our chlorinated biphenyl business.

In summary, Monsanto's decision to withdraw from the PCB business was based on concerns about environmental presence rather than health effects.

2. INFORMATION ON HEALTH EFFECTS

Chlorinated biphenyls range from liquid to solid, depending upon the degree of chlorination. On the basis of single dose animal tests commonly used to identify and label hazardous materials, they would be considered to be relatively harmless substances. Monsanto has conducted such acute toxicity and irritation tests on several chlorinated biphenyls over the years (1).

Questions have been raised in four areas of possible health effects of chlorinated biphenyls. These have been related to 1) skin (reddening, chloracne), 2) systemic effects (liver damage, respiratory effects), 3) environmental exposure, and 4) potential carcinogenicity.

A review of the literature from the 1930s and 1940s on the health effects of chlorinated biphenyls contains statements such as "Much of the literature that refers to chlorinated diphenyls is referring to the mixture of chlorinated diphenyl with chlorinated naphthalene." and "A number of the references recorded under chlorinated naphthalenes also discussed chlorinated diphenyl. It is difficult to determine the role played by the chlorinated diphenyls, as, in most instances, they were mixed with chlorinated naphthalene" (2). A parallel situation occurred during the late 1960s when reports of the detection of polychlorinated biphenyls in the environment

began to appear. There was confusion and disagreement as to whether polychlorinated biphenyls or other halogenated hydrocarbons such as DDT were being measured, since the latter had already been identified as environmental contaminants.

Skin

Sometime before 1934, Swann Chemical Co. observed dermatological symptoms in workers exposed to chlorinated biphenyls. In May, 1934, Swann Research, Inc., requested Dr. F. B. Flinn of Columbia University's College of Physicians and Surgeons to conduct an investigation "to determine whether or not the various chlorinated diphenyl compounds submitted or some impurities contained therein might be the causative agent producing the dermatitis which had developed among some of the workmen in the plant." He commented on these studies as follows:

> "One is impressed with the fact that each of the Aroclors giving a positive reaction were of a fluid nature. Attempts were made to expose the animals to vapors but observations made us conclude that the only difference was that the animal would be exposed to the hot material and it was well-known that the reaction where such an exposure is given is more severe.
>
> "One cannot but feel that any styrene compound which may be found to be present as an impurity is the cause of your trouble. I was rather surprised that more of the compounds submitted did not show or give reactions with the skin. It has been shown in some investigations that chlorine did not produce a dermatitis when metallic electrodes were used but did if the metallic electrodes were replaced by carbon electrodes. The theory was advanced that some organic chlorine compounds were produced in the latter case.

> "I would suggest that you study your ventilation system in places where fumes are given off. That means be provided for the men to take a bath with soap and water if they come in contact with the type of material found to be positive. By this I mean if a leak or spillage occurs. The immediate bathing under these circumstances should be insisted on. I found that where I had gotten the material on my hands if I washed them thoroughly no trouble arose."

In his transmittal letter to Dr. J. N. Carothers of Swann Research, Inc., Anniston, Alabama, Dr. Flinn stated:

> "It may interest you to know that the dermatitis which was produced by your materials in the case of rabbits cleared up in a couple of weeks, indicating that unless there are repeated exposures the effects are only of a temporary nature. As I said before, I believe that if washing facilities are present and the men are instructed to use them it will do much to supplement the increased ventilation which you have installed." (3)

In the published literature, "the first observations on the development of acnelike lesions among workers in the United States coming in contact with chloronaphthalenes and chlorodiphenyls as well as acute yellow atrophy of the liver occurring among such workers were reported in 1935" (4). Results of Swann studies were published in 1936 (5).

There is a letter report dated December 22, 1949, to Dr. R. E. Kelly (Monsanto) from Dr. L. K. Halpern of the Barnard Free Skin and Cancer Hospital (St. Louis) describing a human patch study. This consisted of applying film treated with 11.5 percent AROCLOR and gauze moistened with 100 percent AROCLOR to skin of the upper arm of 218 volunteers using the

technique developed by Dr. Louis Schwartz, Medical Director of the United States Public Health Service. Dr. Halpern reported "If the procedure recommended by the United States Public Health Service is sufficient to distinguish between chemical compounds that are innocuous when applied to the skin and other compounds that are primary irritants or sensitizers, then it would seem that Aroclor has no primary irritant effect nor is it a sensitizer of high potency." (6) Monsanto records show that this study was conducted with AROCLOR 1254.

In 1963, Monsanto received reports of subacute rabbit dermal studies it had sponsored on several chlorinated diphenyls. Salient features of these studies, conducted according to then-currently acceptable procedures, are summarized below (1).

AROCLOR	1221	1242	1248	1254	1268
No effect level*	150	50	10	10	500
LD_{50}**	250	75	50	75	1250
Local skin effects	none	none	none	yes	yes
Systemic injury	none	none	liver injury	liver injury	liver injury

* All dosages in mg/kg/day
** Based on 20-day dosing and 14-day observation periods

These studies showed that repeated and prolonged skin contact with the higher chlorinated biphenyls could produce skin irritation and that harmful amounts could be absorbed under such conditions. They also demonstrated that there was a safe level of exposure for each material, and that they could be handled safely if the earlier precautions to avoid excessive skin contact were observed.

Systemic Effects

On June 30, 1937, a symposium on systemic effects resulting from inhalation of chlorinated hydrocarbons was held at the Harvard School of Public Health. Dr. R. E. Kelly of Monsanto participated in the sessions at which results of investigations requested by manufacturers of chlorinated hydrocarbons were presented. Subsequently, three papers summarizing the results of those studies appeared in the scientific literature (7,8,9). With respect to chlorodiphenyls, the Harvard group concluded that "...it appears safe and it is certainly easily attained, to ventilate so that the air breathed does not contain more than 0.5 mgm. per cu.m. of any of these compounds...". In a separate unpublished report to Monsanto Company (10) Dr. C. E. Drinker of Harvard described the results of inhalation studies conducted with compound #1268, having a chlorine content of 68 percent. He concluded, "#1268, if handled with ordinary precautions as to ventilation, should be entirely harmless to workmen."

Monsanto sponsored a study at the University of Cincinnati's Kettering Laboratory on "The Toxicity of the Vapors of AROCLOR 1242 [R] and AROCLOR 1254[R]." A report of those studies (11), presented at the 1956 meeting of the American Industrial Hygiene Association, stated that the investigation "...was undertaken because in the earlier literature dealing with the toxic effects of Aroclors, no distinction has been drawn between the toxic effects of chlorinated biphenyls and those of chlorinated napthalenes..."

No injury was observed after prolonged intermittent exposure of several species of animals to AROCLOR 1242 at air concentrations of 1.90 to 8.63 micrograms per liter. Animals subjected to comparable exposures of AROCLOR 1254 showed signs of apparently reversible liver cell injury. The authors concluded their observations by saying "It should be noted that it was necessary to heat these Aroclors in order to increase the rate of volatilization sufficiently to attain the concentrations maintained in these experiments. To the extent that their industrial usage is carried out at ordinary temperatures, the hazard of their inhalation may well be slight or entirely absent."

These studies confirmed earlier work which indicated that no harmful effects were to be expected if these materials were used with adequate ventilation since it was necessary to heat the substances to generate sufficiently high air concentrations to injure the test animals.

Prior to 1956, the American Conference of Governmental Industrial Hygienists (ACGIH) had established a Threshold Limit Value (TLV) of 1 mg/m^3 for chlorodiphenyl. In 1956, the listing was changed to read chlorodiphenyl (42% chlorine) as 1 mg/m^3. The 1957 list showed chlorodiphenyl (42% chlorine) as 1 mg/m^3 and an added TLV of 0.5 mg/m^3 for chlorodiphenyl (54% chlorine). The latter two values have been unchanged since then (12). Results of the Monsanto-sponsored study (11) contributed to the decision of the ACGIH to lower the TLV for the more highly chlorinated biphenyls (13).

Environmental Exposure

In response to reports of the presence of some PCBs in the environment, Monsanto, in 1969, initiated preliminary toxicity studies which led to a series of long-term tests. These tests, on the three predominant commercial polychlorinated biphenyls (AROCLOR 1242, AROCLOR 1254, AROCLOR 1260), consisted of 2-year (lifetime) feeding to rats, 2-year feeding to dogs, 3-generation rat reproduction studies with 2 litters cast per generation, rat teratology studies and dominant lethal mutagenic studies in mice. Toxicity and reproduction studies in chickens were performed to evaluate possible untoward effects in birds such as decreases in eggshell thickness. This series of studies (1) represented the most comprehensive safety tests of the time, and was similar to the tests required for food additives, although Monsanto certainly had no intention of applying for a food additive permit.

The highest dietary level (100 ppm) in the lifetime rat feeding studies produced a weight depression at 24 months in females fed AROCLOR 1254 and liver weight increases in all groups except males fed AROCLOR 1242. As with other halogenated hydrocarbons, the important histopathologic changes were present in the livers of animals sacrificed at the end of the study. These consisted of hepatocellular (liver) alterations such as focal hypertrophy (localized enlargement), cytoplasmic lipid changes and in some animals from the 100 ppm groups, hepatomas or cholangiohepatomas (benign tumors). There was no evidence of hepatocellular carcinogenicity with any of the AROCLOR products.

In the dog 2-year studies, some slight decreases in body weight gain were noted. At the highest feeding level (100 ppm) of AROCLOR 1260, there was evidence of gastrointestinal inflammatory lesions and ulcerations.

In the rat reproduction studies, none of the AROCLOR products produced adverse effects in the 2 litters of the first generation. In the second and third generations, there was a reduction in the mating index and a decrease in the incidence of pregnancy at the 2 highest feeding levels (10 ppm and 100 ppm). The ability of females to carry pups to delivery, once conception had occurred, and to successfully nourish the young was not affected by the three AROCLOR products. No changes were produced in the reproductive tracts of either male or female rats by any of the 3 AROCLOR products.

There was no evidence of teratogenic or mutagenic changes with any of the chlorinated biphenyls at maximally tolerated dose levels in rats and mice.

In the chicken toxicity/reproduction study, AROCLOR 1260 was without effect at all test levels. AROCLOR 1242 and AROCLOR 1254 at 100 ppm in the diet decreased egg hatchability. Poor hatchability of eggs was found from hens fed 8 ppm of AROCLOR 1242. AROCLOR 1242 at 10 and 100 ppm and AROCLOR 1254 at 100 ppm were associated with reduced eggshell thickness. Chick viability was affected by both substances at a dietary level of 10 ppm.

Data developed by Monsanto and information gained from the Yusho incident in Japan were cited by the Food and Drug Administration (FDA) as a basis for establishing tolerances for chlorinated biphenyls in various foods in 1973 (14). Subsequently, the FDA proposed a reduction in those tolerances (15).

In 1976 it was reported that AROCLOR 1248 in the diet of monkeys, at or below FDA tolerance levels for chlorinated biphenyls, adversely affected reproduction (16). FDA limits on PCBs in the human diet are related to a safe level of 1 µg/kg body weight/day (14). The studies carried out by Allen and coworkers (16) were at dosage levels of approximately 89 and 183 µg/kg/day. Their work suggested that there could be a previously unknown effect on reproduction in primates and they failed to define a no-effect level. Monsanto, therefore, undertook a detailed monkey reproduction study with carefully administered dosages at and below those previously studied.

In the Monsanto study, 32 female and 16 male rhesus monkeys, divided into 4 groups each consisting of 8 females and 4 males, were given daily dosages of 0, 5 µg/kg, 25 µg/kg or 100 µg/kg of AROCLOR 1254. The in-life portion of that study, which lasted about 14 months, has been completed.

At Monsanto's highest dosage (100 µg/kg/day), which corresponded to the low level in the Allen study, we find that AROCLOR 1254 has similar effects to those reported earlier for AROCLOR 1248. The results at the lower levels are not completely evaluated.

Potential Carcinogenicity - Animal Studies

In 1975, Dr. Renate Kimbrough reported the induction of liver carcinomas in female rats fed AROCLOR 1260 for two years (17). The same lot of AROCLOR 1260 was used in her study as in Monsanto's earlier test. Monsanto's study showed that AROCLOR 1260 as well as AROCLOR 1242 and AROCLOR 1254, produced liver injury, but no cancers. Therefore, an extensive reevaluation was made of the original liver slides from the Monsanto studies as well as additional liver sections from all rats in the Monsanto two-year feeding studies. These slides were examined independently by Dr. D. Gordon of Industrial BIO-TEST Laboratories, by Professor W. Richter of the University of Chicago and by Professor Parvis Pour of the Eppley Institute for Research in Cancer. In addition, Dr. Pour evaluated sections of liver from rats in Dr. Kimbrough's study.

No carcinomas were seen in the livers of rats from the Monsanto studies, and Dr. Pour did not concur with Dr. Kimbrough's diagnosis of liver cancer in rats from her study (18) (see Attachment 2-2). The different criteria by which pathologists diagnose cancer, and the reported findings of cancer induced by polychlorinated biphenyls in various animal species, have been discussed by Dr. J. C. Calandra (19) (Attachment 2-3).

In 1977, the National Cancer Institute reported results of a bioassay for possible carcinogenicity of AROCLOR 1254. That report stated that AROCLOR 1254 was not carcinogenic under the test conditions (20).

Human Epidemiology Studies

The toxicity testing described above has provided a foundation for understanding the potential effects of chlorinated biphenyls. However, firm conclusions cannot be drawn without human epidemiological data drawn from exposed populations.

"The view that human health risks resulting from exposure to chemicals may be determined experimentally by testing laboratory animals is one that is widely accepted in the scientific community and has been adopted by EPA. Because experimentation on human beings raises ethical questions and because epidemiological studies often provide incomplete information, toxicology studies on laboratory animals are often necessary. However, because the extrapolation from animals to man is subject to some uncertainty, corroboration

of laboratory test data with sound epidemiological information is desirable." (U.S. EPA, Support Document/Draft Voluntary Environmental Impact Statement for Polychlorinated Biphenyls, 1978). Such epidemiological data on PCBs is now becoming available.

Monsanto is aware of seven epidemiological studies done in the U.S. of persons exposed to PCBs. They include persons with occupational as well as community exposure, and the effects studied range from deviations in biological parameters, through reported symptoms and illnesses, to the occurrence of death from various causes.

Selikoff and colleagues studied 326 volunteers who were occupationally exposed to PCBs. They report the percentage of those workers with various dermatological, gastrointestinal, neurological and other symptoms, as well as the percentage with abnormal values of clinical chemistry parameters and of pulmonary function. They concluded that reported symptome and abnormal findings in physical examinations were not related to duration of employment or level of PCBs in the blood, except for abnormal dermatological findings and abnormal levels of some indicators of liver function. Although the authors claim to have found an unusual impairment of pulmonary function in their study population, no effort was apparently made to detrmine whether this impairment was related to the other findings (see Attachments 2-4 and 2-5).

In spite of a correlation of some liver function parameters with PCB exposure, the prevalence of abnormal liver function was low. The authors state, "The paucity of other abnormalities on physical examination was striking; this included a very low prevalence of abnormal liver findings." (emphasis in original).

The Center for Disease Control examined liver function and blood levels of chlorinated biphenyls in a sample of PCB workers, their families, and exposed persons in the community, in Bloomington, Indiana. This study found very mild liver dysfunction (increased levels of the enzyme GGTP) and increased blood levels of a cholesterol-like substance in persons with higher blood levels of PCBs. It is not clear if these findings have any relationship to actual illness (see Attachment 2-6).

The Michigan Department of Public Health conducted a study of 182 persons who regularly consumed sports fish, a source of PCB, and classified as "exposed", "intermediate" and "controls" according to the amount of fish consumed. A direct relationship was found between the amount of fish consumed and blood level of PCB. However, no significant difference was found between the controls and the exposed in the incidence of 18 health conditions, many of which described the symptoms reported for Yusho disease. Furthermore, in 12 of the 18 conditions, people with the condition had lower blood

PCB levels than those without the condition. The authors conclude, "As a group, the exposed participants had no health problems or medical conditions that could be correlated with PCB levels, exposure to Lake Michigan fish, or known symptoms of PCB poisoning" (see Attachment 2-7).

NIOSH has completed a study of mortality rates in workers in a transformer plant where there was exposure to PCBs, but Monsanto is unable to comment because a report of the study is not yet available.

The South Carolina State Department of Health and Environmental Control recently completed a study of 32 workers in a capacitor plant, 10 of whom were regularly exposed to PCBs. Details of the study available to Monsanto are limited to those contained in newspaper reports, but the study apparently involved a medical examination and a determination of blood PCB level. The authors state that the study "clearly shows that at present there is no evidence of physical harm resulting from working with PCBs." (See Attachment 2-8)

These four recent studies appear to constitute the most extensive epidemiological work yet done on chlorinated biphenyls. They each indicate an absence of morbidity (ill health) associated with significant exposure to PCBs.

The Mobil Corporation carried out a study of the occurrence of cases of cancer in a population exposed for varying lengths of time between 1949 and 1957. Plant medical

records were used to determine the occurrence of cancer in this group between 1958 and 1975. However, records were not available for about 20 percent of the eligible study group. The 41 men who were actually studied differed from the populations described above in that they were employed in a chemical plant which manufactured a number of different materials to which they might have been exposed during their working careers. The study found an excess of skin cancer (melanoma) based on three cases. After a preliminary report of these findings was made, the Mobil Corporation informed NIOSH that there had been "a substantial change" in the definition of the cohort, and that an analysis of the changed cohort might show quite different results. As far as Monsanto is aware, that analysis has not yet been completed.

In 1975, independent of the Mobil effort, Monsanto began to gather information for a mortality study of employees exposed to PCBs at its W. G. Krummrich plant in Sauget, Illinois. Because the plant had manufactured a number of chemicals those persons exposed to PCBs typically had a mixed exposure to other substances as they moved from job to job. Because the work histories of past employees were not computerized, it would have been necessary to identify those who had worked with PCBs by a manual search through 6,000 records. A preliminary identification was made of 50 deaths from various causes among past workers with PCB exposure, and a

review of these suggested a possible excess of lung cancer, but not of skin or pancreatic cancer. This preliminary finding was announced in 1976.

A further attempt to identify a cohort yielded 89 men who had been exposed for at least six months in the period 1945-1965, who were then followed to determine their vital status as of the end of 1977. There were no excess deaths from pancreatic cancer, but 4 lung cancer deaths were found where about 1.5 would be expected. Smoking histories were not available. The accuracy of the determination of this cohort was limited by the necessity of conducting a manual search of the records.

At the present time, computerization of the Krummrich work histories is underway, and should be completed early in 1980. At that time it will be possible to better define the exposed population, and to better determine the other substances to which the population was exposed. However, because of the mixed nature of exposures in a chemical plant, it is unlikely that the Monsanto study can ever be as specifically related to PCBs as those conducted by Dr. Selikoff, CDC, the Michigan DOH, and the South Carolina DOH.

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3. MONSANTO ACTIONS RESULTING FROM HEALTH DATA

Monsanto has been responsive to health questions about chlorinated biphenyls over the years. Those responses have been consistent with "state of the art" procedures available at the time the questions were raised. It should be noted that Monsanto's decision to leave the PCB business was based on concerns over environmental presence, not health effects.

Skin and Systemic Effects

When first reported in 1935 (1,2), the occurrence of skin and systemic effects from chloronaphthalenes and chlorodiphenyls constituted a new occupational health problem. It rapidly became of concern to federal and state occupational health personnel and to their industrial counterparts. Monsanto was among the sponsors of and a participant in the studies and the subsequent symposium held on this subject at Harvard University (3). In addition, Monsanto conducted its own studies on various polychlorinated biphenyls (4,5,6,7). Earlier, Swann Research, Inc. had conducted human patch tests on these materials (8). Results of these efforts suggested that controlling skin contact and vapor inhalation would permit safe industrial use of these substances.

In 1936, Monsanto began developing a corporate medical program. From the start, Monsanto's Medical Director ensured that chlorinated biphenyl workers at Anniston were included in this program. This consisted of periodic physical examinations, good work practices to ensure personal

cleanliness of employees, adequate ventilation of the work areas, and overall good industrial hygiene practices. The buildings at the Anniston plant were relatively open and most of the processing was done in closed equipment. Therefore, employee exposure was relatively low. However, since some customers were using chlorinated biphenyls at elevated temperatures, with a greater potential for exposure, precautionary statements for handling them were prepared for customer use as early as 1937 (9) (see Attachment 3-1, 3-2, 3-3). As additional information developed, it was incorporated into Monsanto work practices and distributed to customers by way of correspondence, technical bulletins, and other corporate publications (see Attachment 3-4). In addition, upon request, Monsanto technical and medical personnel visited customer plants to advise them on safe handling of polychlorinated biphenyls. Finally, the Monsanto-sponsored studies on AROCLOR 1242 and AROCLOR 1254 led the American Conference of Governmental Industrial Hygienists (ACGIH) to lower the Threshold Limit Value (TLV) for the higher chlorinated biphenyls in 1957 (10).

Environmental Presence

In late 1966, Soren Jensen of the Karolinska Institute in Sweden reported the detection of polychlorinated biphenyls in the environment. This was confirmed by 1970. In the interim, Monsanto's European office had entered into discussions with the Karolinska Institute in an attempt to obtain details of the findings. In early 1969, representatives

of Monsanto went from St. Louis to Sweden to meet with Jensen. He was not available, and discussions were held with his professor, Dr. Widmark. At about the same time, Monsanto decided to develop data on the chronic oral toxicity of chlorinated biphenyls. Although there was no intention of petitioning for such use, the extent of these tests was typical of those designed for the evaluation and establishment of the safety of direct and indirect food additives. This series of tests was undertaken because it represented the most comprehensive requirement of safety at that time (11). FDA was informed of the voluntary testing program in October, 1969 (12). Subsequently, as evidence of environmental presence increased, those studies were expanded in scope. Chicken studies to determine the effects of chlorinated biphenyls on avian species were completed in 1970 and 1971. Results of all these studies have been distributed to the FDA and other regulatory agencies. During this time period, Monsanto expanded the warnings on its product labels to include cautions against allowing escape to the environment (Attachment 3-5).

When, in 1976, reproductive disorders were reported in monkeys fed chlorinated biphenyls (13), Monsanto undertook a study to determine the validity of those findings. The Monsanto study is being conducted with AROCLOR 1254, a large volume material, instead of the relatively low volume AROCLOR 1248 used by the earlier investigators.

Potential Carcinogenicity

In 1975, after Dr. Kimbrough reported that AROCLOR 1260 produced liver cancer in rats (14), Monsanto undertook a

review of liver sections from its earlier studies on AROCLOR 1242, AROCLOR 1254, and AROCLOR 1260. In addition, it retained Dr. Pour of the Eppley Institute for Research in Cancer to review all liver sections from all of the AROCLOR studies, i.e., Monsanto's and Dr. Kimbrough's (15). That review showed no occurrence of liver cancers. Finally, Dr. Calandra was retained to review and comment on available literature dealing with carcinogenicity of polychlorinated biphenyls (16). Results of those evaluations have been made available to regulatory agencies.

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4. CUSTOMER RECORDS

Over the years, Monsanto developed the normal commercial records on its sales of chlorinated biphenyls. They were useful for sales and service calls, accounting, production forecasting, and, when decisions were reached to limit chlorinated biphenyls, customer lists served as the basis for our notification visits, telephone calls, letters, and publication mailings in the period 1970-1972, as we phased out all but dielectric chlorinated biphenyl sales.

5. COMMUNICATING WITH CUSTOMERS

Notification Procedures

Beginning in February, 1970, Monsanto notified its customers of the early reports that PCBs had been detected in the environment. Additional information was transmitted to customers as it became available, along with details of Monsanto's phaseout. The notification letters included as Attachment 5-1 indicate the priority given to terminating applications that seemed relatively likely to lead to environmental release, were food related, or used the more highly chlorinated products. We cooperated with users of hydraulic fluids and heat transfer fluids to discontinue PCB use.

Simultaneously we introduced AROCLOR 1016, a lower chlorinated product for capacitor use, and restricted transformer fluid sales to equipment manufacturers only. In the case of both capacitor and transformer producers, we emphasized the need for control of PCBs. In 1974, Monsanto revised its dielectric literature to conform to the ANSI guideline (Attachments 5-2, 5-3, 5-4) which resulted from the industry work with ANSI referred to earlier. In 1976 the ANSI committee was reconvened to consider the need for revision of the guidelines. Completion of this task has been deferred pending issuance of EPA regulations on PCBs.

Monsanto Provided PCB Disposal Assistance to Customers

In 1969 Monsanto started testing the efficiency of PCB destruction by high temperature pyrolysis and constructed

a 6 million pounds/year unit which was completed in May, 1971. This incinerator was designed, and was demonstrated, to destroy PCB wastes at 99.9998 percent efficiency (Attachment 5-5).

By September, 1971, this unit was in continuous operation and was destroying both waste from our production and PCBs returned by customers as they converted to non-PCB replacements. When phaseout from nonelectrical applications was complete, the incinerator was used to destroy waste PCB which collected from ongoing dielectric use.

A system was developed to properly handle customer return of wastes (Attachment 5-6). When some customers did not follow our suggested procedures, Monsanto reemphasized the need for proper packaging (Attachment 5-7). To assist in proper handling, posters were prepared and distributed to further educate those responsible for collection and handling of PCB wastes (Attachment 5-8).

In the period 1975-1976, large (approximately 80 million pounds/year) commercial facilities became available which could handle controlled PCB incineration more efficiently and economically than Monsanto's small prototype unit. These units incinerated PCBs until their operations were curtailed by the need for a specific permit under the EPA disposal regulations for PCBs, which became effective on April 18, 1978. The first permit has yet to be issued. The potential risks of accidental PCB contamination have undoubtedly increased because of the delay in EPA implementation of its incineration policy.

Label Warnings

In 1970 Monsanto modified the labeling of PCB packages to emphasize the need to keep it from the environment (Attachment 5-9). Subsequently, labels on drums were written in seven languages (Attachment 5-10).

Assistance with Identification of PCBs

Because of the changes in composition of PCB dielectric fluids since their introduction, Monsanto worked with the IEC to document such changes. This led to ASTM standard D2283, which lists the composition of all transformer askarels used at various times since 1932 (Attachment 5-11).

Monsanto researchers worked within ASTM to develop refined technology for determination of PCBs in the environment. This resulted in approval of ASTM D3304 (Attachment 5-12) which has become standard methodology for PCB quantification. While many laboratories have the necessary equipment, proficiency in the methodology varies widely. Monsanto's Applied Sciences group regularly consults with laboratories as they gain experience in testing for PCBs. Regulations require many such tests to be performed. The testing load has been greatly increased by the policy EPA adopted in controlling PCB-contaminated oils at the 50-500 ppm level. This is causing serious delays in reporting of test results.

We recognized that after Monsanto terminated production of chlorinated biphenyls small samples of products which had previous commercial significance would be required for research and standardization of detection equipment.

Arrangements were concluded with a laboratory supply house to take custody of a limited drum quantity and to supply such samples.

Continuing Research

Monsanto is funding studies at two major universities which are directed at finding innovative approaches to reducing PCB levels in the environment.

6. PCB DISPOSAL

During the years Monsanto made chlorinated biphenyls, the quantity of waste produced was relatively low and consisted chiefly of distillation residues, after separation of the useful product mix. Until 1971 these residues were landfilled. From 1971 to 1977 production waste was incinerated.

COM-72-10419

Polychlorinated Biphenyls and the Environment

Interdepartmental Task Force on PCBs
Washington D.C.

May 1972

Attachment 1-1

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MONS 218817

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15. Supplementary Notes

16. Abstracts

This report is the product of a six month review of the chemicals known as PCBs--polychlorinated biphenyls--by five Federal agencies, with participation by other agencies. The Interdepartmental Task Force on PCBs had as its goal the coordination of the scientific efforts of the Government aimed at understanding PCBs and the strengthening of the Government's ability to protect the public from actual or potential hazards associated with them. The task force made nine findings, conclusions, and recommendations, primarily pointing out that PCBs should be restricted to essential or nonreplaceable uses which would minimize the likelihood of human exposure or leakage to the environment. Supplementing the 20-page report are eight appendices detailing current knowledge about various aspects of PCBs, including their use and replaceability; occurrence, transfer, and cycling in the environment, occurrence and sources in food; and PCBs effects on man and animals.

17. Key Words and Document Analysis. 17a. Descriptors

Pollution,
*Chlorine aromatic compounds,
*Biphenyl/chloro,
Environmental surveys,
Insulating oil,
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PREFACE

On September 1, 1971, representatives of several agencies of the Federal Government established an interdepartmental task force to coordinate the scientific efforts of the Government aimed at understanding the family of chemical compounds known as polychlorinated biphenyls (PCBs), and to strengthen the Government's ability to protect the public from actual or potential hazards from PCBs. On September 5 it was announced that the task force would "coordinate a government-wide investigation into PCB contamination of food and other products". On September 13 the task force, made up of qualified specialists from a range of disciplines, held the first of a series of meetings. Appropriate spokesmen on various problems associated with PCBs were assigned to prepare a series of background papers, drawing on the resources of their own and other agencies.

The task force included operating units of five Executive Branch departments: Department of Agriculture; Department of Commerce (Assistant Secretary for Science and Technology and National Oceanic and Atmospheric Administration); Environmental Protection Agency; Department of Health, Education, and Welfare (Food and Drug Administration and National Institute of Environmental Health Sciences of the National Institutes of Health); and Department of the Interior (Bureau of Sport Fisheries and Wildlife).

The report which follows represents the results of the task force's review and reflects the position of the operating agencies of the Federal Government which have major responsibilities concerning such chemicals as PCBs in food and in the environment. The task force had the advantage of some additional sources of information and review on PCBs. For example, during the course of the study, the National Institute of Environmental Health Sciences sponsored an international scientific meeting on PCBs on December 20-21, 1971, at the Quail Roost Conference Center, Rougemont, North Carolina. One hundred persons--from Government, universities, industry, and the press--attended. The proceedings of this conference soon will be published by the Institute. The task force also met from time to time with a group of scientific advisors from outside the Federal Government, which was already at work prior to September 1971 examining a number of hazardous trace substances, one of which was PCBs.

The individuals who served on the task force included: Dr. John E. Spaulding and Dr. Harry W. Hays (Department of Agriculture), Dr. Robert W. Cairns and Dr. William Aron (Department of Commerce), Dr. John Buckley (Environmental Protection Agency), Dr. Lawrence Fishbein, John R. Wessel, and Dr. Albert Kolbye (Department of Health, Education, and Welfare), Dr. Lucille Stickel (Department of the Interior), Dr. Edward J. Burger, Jr. (Office of Science and Technology), and Dr. Terry Davies (Council on Environmental Quality). Many others participated in some of the meetings and lent assistance in a variety of ways including authorship of background papers published as appendices in this report. The task force is grateful for this assistance.

The task force will continue to assess new information that comes to its attention.

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FINDINGS, CONCLUSIONS, AND RECOMMENDATIONS

Polychlorinated biphenyls (PCBs) have been used in the United States and elsewhere over the past 40 years, for many industrial and consumer applications. During the past three years evidence has accumulated to indicate that PCBs are widely dispersed throughout the environment and that they can have adverse ecological and toxicological effects.

The principal uses for PCB fluids are in the electrical industry. PCBs have superior cooling, insulating, and dielectric properties and hence are widely used in various electrical devices. Transformers and capacitors filled with PCBs can be used in inside locations where failures of oil-insulated equipment would present a potential danger to life and property. Because PCBs are relatively nonflammable, apparatus containing them is essentially free from the fire and explosion hazards associated with oil-insulated and oil-cooled electric devices. Stability at high temperatures is another major factor in the attractiveness of these compounds. The principal advantage of PCBs over substitutes is the relative freedom from flammability in some applications that previously had been plagued by serious fires. PCBs also give electrical equipment the critical advantages of reliability, long life, and compactness. PCB impregnated capacitors, for example, are markedly more reliable and long-lived, and 1/6 the size, 1/5 the weight, and 1/4 the cost of comparable oil impregnated capacitors. Small capacitors with PCBs have a use-life expectancy of 10 to 15 years, and large capacitors 20 to 25 years. PCBs in transformers are replaced only every 25 to 30 years.

PCBs have been discovered to have a widespread distribution in the environment, and some environmental occurrences have been associated with adverse effects on certain forms of animal life. Beginning in 1971, the Monsanto Company, the sole U. S. producer, has reported taking voluntary actions to reduce the volume of PCB production and to limit its distribution to industries concerned with the manufacture of electrical apparatus. Similar restrictions have been put into effect by statute in Sweden and voluntarily in Great Britain.

A large use of PCBs had been in carbonless duplicating paper. This use has been discontinued. The Food and Drug Administration and the food industry have increased their surveillance to assure that PCBs are not used in food plants, products, or packaging.

The task force has reviewed all of the available scientific information on various aspects of the PCB problem. It has found much data that it regards as inadequate and many questions that remain unanswered. But on the basis of available information, the task force concurs on the following findings, conclusions, and recommendations:

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1. PCBs should be restricted to essential or non-replaceable uses which involve minimal direct human exposure since they can have adverse effects on human health. There currently are no toxicological or ecological data available to indicate that the levels of PCBs currently known to be in the environment constitute a threat to human health, but additional experiments are underway to evaluate the impact of low level, long-term exposure to PCBs.

2. PCBs have been used so widely over such a long period that they are ubiquitous. Even a total cessation of manufacturing and use of PCBs would not result in the rapid disappearance of the material, and ultimate disappearance from the environment will take many years. The elimination of non-essential uses and prohibition of discharges from essential uses will result in gradual elimination from the environment.

3. PCBs were first identified as potential food contaminants in 1966. Three principal sources or routes of contamination of food have been identified. General environmental contamination has resulted in PCB residues in some fresh water fish. Prohibition of PCB discharges into water will result in the reduction of such residues. Another route occurs from the presence in food packaging materials of PCB residues, some of which migrate into packaged food. The FDA has proposed regulations for food packaging materials and foods to deal with this problem. The third route involves accidental contamination of food from leakage or spillage of PCBs into feed or directly into food. The dietary intake of PCBs is of low order and does not present an imminent health hazard. To date, all of the high levels of PCBs encountered in human or animal foods have been associated with accidents, for which Government agencies have exercised necessary regulation and control to minimize the distribution of contaminated foods.

4. The sole domestic producer of PCBs, Government agencies, and key user industries are taking appropriate steps to cut off further introduction of PCBs into the food supply and to reduce the current levels of PCBs as food and environmental contaminants. The Food and Drug Administration (FDA) has acted, under the authority of the Food, Drug, and Cosmetic Act, to preclude the accidental PCB contamination of food. It has also proposed a prohibition on the use in food packaging materials of pulp from reclaimed and salvaged fibers that contain poisonous or deleterious substances that may migrate into the food if the contamination by such substances is deliberate or avoidable. It has proposed temporary tolerances for unavoidable PCB residues in food packaging materials and in certain foods. The Department of Agriculture has acted under the Wholesome Poultry Act and other statutes to prevent accidentally contaminated foods from reaching the market.

The major gap in the regulatory system to deal with PCBs is the absence of any broad Federal authority to restrict use or distribution of the chemical, to control imports, and to collect certain types of information. The task force believes that such authority is needed. This authority would be provided by the Toxic Substances Control Act proposed by the Administration and now pending before Congress.

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5. Housekeeping is particularly important in the manufacture, use, and disposal of PCBs. Under a program of limitation on the sale of PCBs, the electrical industry will continue to be the principal user of PCBs; it, as well as industries now holding inventories of PCBs, have a special responsibility for monitoring and controlling their wastes. In this connection, the Environmental Protection Agency will restrict industrial liquid discharges of PCBs from PCB users. To keep levels in fish as low as possible, and in any case below FDA's interim action level of 5 parts per million, concentrations in rivers or lakes from all sources should not exceed 0.01 parts per billion.

6. The use of PCBs should not be banned entirely. Their continued use for transformers and capacitors in the near future is considered necessary because of the significantly increased risk of fire and explosion and the disruption of electrical service which would result from a ban on PCB use. Also, continued use of PCBs in transformers and capacitors presents a minimal risk of environmental contamination. The Monsanto Company, the sole domestic producer, has reported voluntarily eliminating its distribution of PCBs to all except manufacturers of electrical transformers and capacitors.

Pending passage of the Toxic Substances Control Act, the Federal Government does not have the legal authority to impose restrictions corresponding to the actions reported by Monsanto. Although some Federal enforcement authority is available, the Federal Government does not have the authority to control PCBs at their source.

7. Most capacitors presumably have been disposed of in landfills. PCB containing material buried in soil is not expected to migrate but should remain in place. In the past, many fluids containing PCBs have been disposed of in sewers. More appropriate means of disposal such as high-temperature (at least 970°C) incineration must be used instead.

8. PCBs are manufactured in countries other than the United States. Importation of PCBs as a chemical or as a component in products remains legally possible because the Toxic Substances Control Act has not yet become law. Electrical products imported from abroad may contain PCBs. The task force looks to international agreements to bring about some multi-national understanding on the sale and use of PCBs globally. Importation of PCBs for uses other than those singled out in the present pattern of voluntary limitations should be avoided by users.

As an additional measure, the United States has asked the Organization for Economic Cooperation and Development (OECD) through its Environment Committee to make a special review of member states' national policies concerning PCBs and also to identify products moving in international trade which contain PCBs. OECD, whose membership includes all major Western industrialized states plus Japan and Australia, has been giving priority attention to the problem of PCBs over the past year.

9. More scientific information about PCBs is needed, and several Government agencies are seeking it through research. The task force recognizes that the scientific basis of much of our knowledge must be

strengthened through research. The total exposure of a human being to a given substance from all sources--air, water, and food--must be considered, and interactions of PCBs and other substances within and outside the body must be evaluated. Similar consideration must be given to the other body organisms.

Current scientific knowledge gained from laboratory animal experiments is often inadequate to allow reliable interpretation of the data in terms of possible effects on man. The scientific basis for interpreting such tests must be improved.

The situation regarding PCBs is not significantly different from the problem of other toxic susbstances which cause concern when they come into contact with man, his food, and his environment. Continuing vigilance on the part of Government agencies, industry, universities, and many other agencies both within and outside the Government will be necessary to achieve an effective system for assessing and controlling the hazards of toxic substances, including PCBs.

The task force, by reviewing research needs and the present Federal research effort, has helped to insure that these efforts of the agencies are well planned and coordinated. Certain Government laboratories as well as a number of non-Government scientists recently have embarked on additional research on PCBs, and the results will be communicated to the scientific public completely and promptly through normal channels such as meetings and journals.

I. PRODUCTION, DISTRIBUTION, AND USE OF PCBS

Polychlorinated biphenyls (PCBs) were first manufactured commercially in 1929. By virtue of their unusual chemical and physical properties, they achieved widespread use in a variety of applications. PCBs are now manufactured in Great Britain, France, Germany, the USSR, Japan, Spain, Italy, and Czechoslovakia, as well as in the United States.

In the United States, PCBs have been manufactured by a single producer, the Monsanto Company, and marketed under the tradename "Aroclor". Table 1 gives a breakdown, by category of use and by type of PCB, of the total U. S. production, domestic sales, and U. S. export sales from 1957 to the present. Figure 1 and Figure 2 summarize these data for the years 1963 through 1971.

Both production and domestic sales of PCBs roughly doubled between 1960 and 1970. If one assumes a constant rate of growth of domestic sales since 1930, the cumulative sales in North America by 1970 would be of the order of 500,000 tons. (1) Corresponding data on production and use of PCBs outside the United States are not available. Current estimates suggest that total U. S. production represents roughly one-half of the total world production.

As can be seen in Table 1, the majority of the PCB material produced in the U. S. was marketed domestically. Between 1963 and 1971, the proportion of the production which was exported averaged 13 percent. In 1971, the Monsanto Company reportedly undertook a variety of voluntary restrictions on the distribution of PCBs to various categories of industries. Both

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TABLE 1
PCB MANUFACTURING AND SALES
DATA FROM MONSANTO INDUSTRIAL CHEMICALS CO.
1957 THROUGH 1971
(Thousands of Pounds)

	1957	1958	1959	1960	1961	1962
TOTAL PRODUCTION (For Domestic Sales)(1)				37919	36515	38353
DOMESTIC SALES	32299	26061	31310	35214	37538	38043
DOMESTIC SALES BY CATEGORY						
Heat Transfer	-	-	-	-	-	157
Hydraulics/Lubricants	1612	1549	2685	2523	4110	3915
Misc. Industrial	704	755	1569	1559	2114	1681
Transformer	12955	5719	5984	7921	6281	7984
Capacitor	17028	14099	16499	16967	15935	15382
Plasticizer Applications(2)		3939	4573	6244	9098	8924
Petroleum Additives	-	-	-	-	-	-
Total	32299	26061	31310	35214	37538	38043
DOMESTIC SALES BY PCB GRADE						
Aroclor 1221	23	16	254	103	94	140
Aroclor 1232	196	113	240	155	241	224
Aroclor 1242	18222	10444	13598	18196	19827	20654
Aroclor 1248	1779	2559	3384	2827	4023	3463
Aroclor 1254	4461	6691	6754	6088	6294	6325
Aroclor 1260	7587	5982	6619	7330	6540	6595
Aroclor 1262	31	184	359	326	361	432
Arcolor 1268	-	72	102	189	158	210
Total	32299	26061	31310	35214	37538	38043

NOTE: (1) Production amounts prior to 1960 are not available.
(2) Amounts for plasticizer applications prior to 1958 are not available.

TABLE 1 (cont.)

	1963	1964	1965	1966	1967	1968	1969	1970	1971	Prospect 1972
U.S. PRODUCTION	44734	50833	60480	65849	75309	82854	76387	85054	40471	25-30 m
DOMESTIC SALES (LBS.)	38132	44869	51796	59078	62466	65116	67194	73061	37635	25-30 m
U.S. EXPORT SALES	3647	4096	4234	6852	8124	11231	10624	13651	9876	?
U.S. DOMESTIC SALES BY CATEGORY										
Heat Transfer	582	929	1237	1766	2262	2529	3050	3958	3480	-
Hydraulics/Lubricants	3945	4374	4616	4258	4643	5765	8039	7403	1643	-
Misc Industrial	1528	1692	1841	1779	1426	1283	1079	1627	578	-
Transformer	7290	7997	8657	8910	11071	11585	12105	13828	11528	25-30 m
Capacitor	15606	19540	23749	28884	29703	29550	25022	26708	17305	25-30 m
Plasticizer Applications	9181	10337	11696	13481	13361	14404	16460	19537	3102	-
Petroleum Additives	-	-	-	-	-	-	1439	-	-	-
U.S. DOMESTIC SALES BY PCB GRADE										
Aroclor 1221	361	596	369	528	442	136	507	1476	1600	300
Aroclor 1232	13	13	7	16	25	90	273	260	211	300
Aroclor 1242	18510	23571	31533	39557	43055	44853	45401	40588	21000	4000
Aroclor 1248	5013	5238	5565	5015	4704	4894	5650	4673	261	-
Aroclor 1254	5911	6280	7737	7035	6696	8891	9822	12421	5800	6000
Aroclor 1260	7626	8535	5831	5875	6417	5252	4439	4890	1750	600
Aroclor 1262	414	446	558	768	840	720	712	1023	-	-
Aroclor 1268	284	190	196	284	287	280	300	330	-	-

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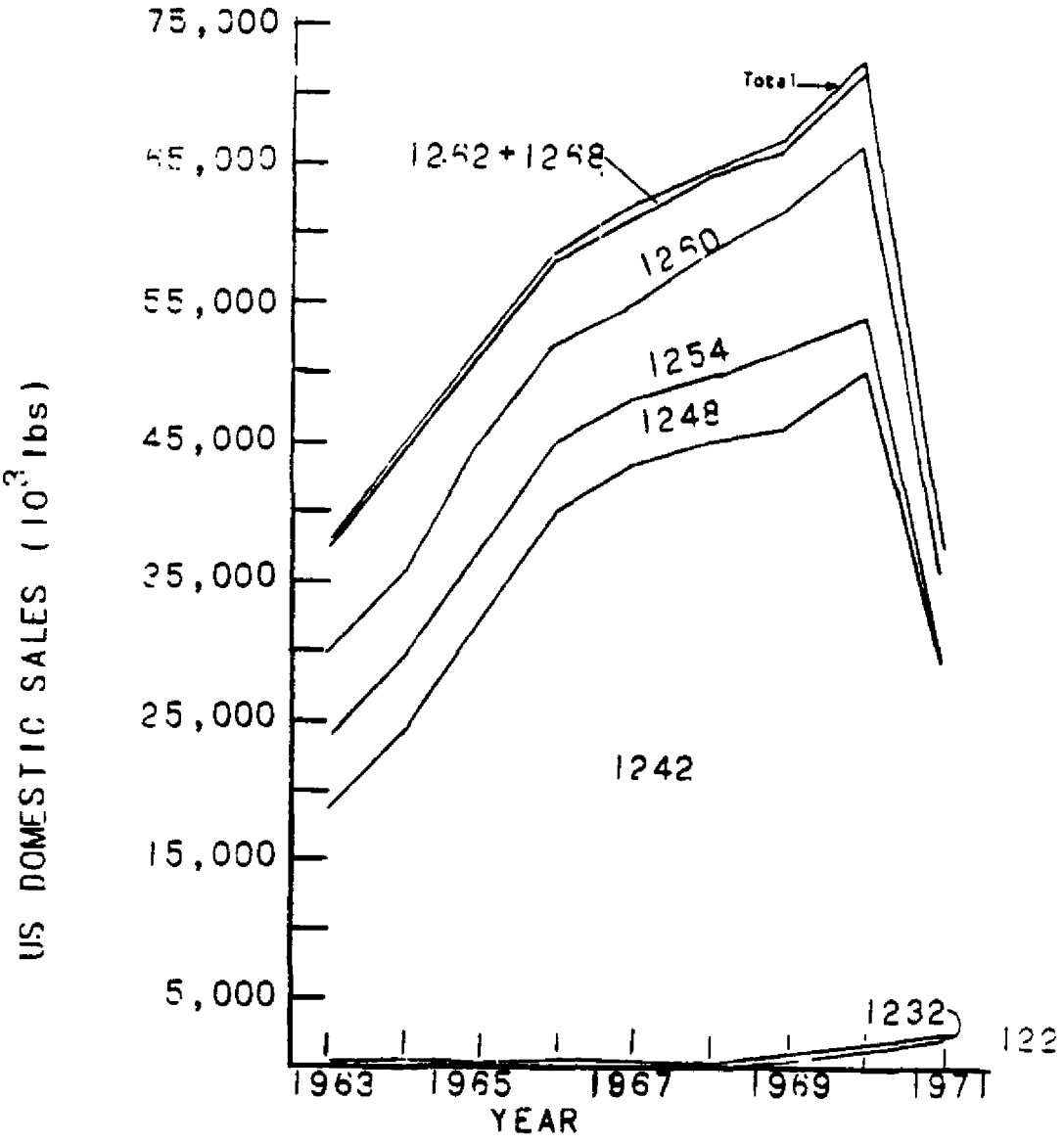

FIGURE 1. US DOMESTIC SALES OF PCBs BY GRADE The uppermost curve represents the total sale

From Nisbet, I.C.T., and Sarofim, A.F. (1)

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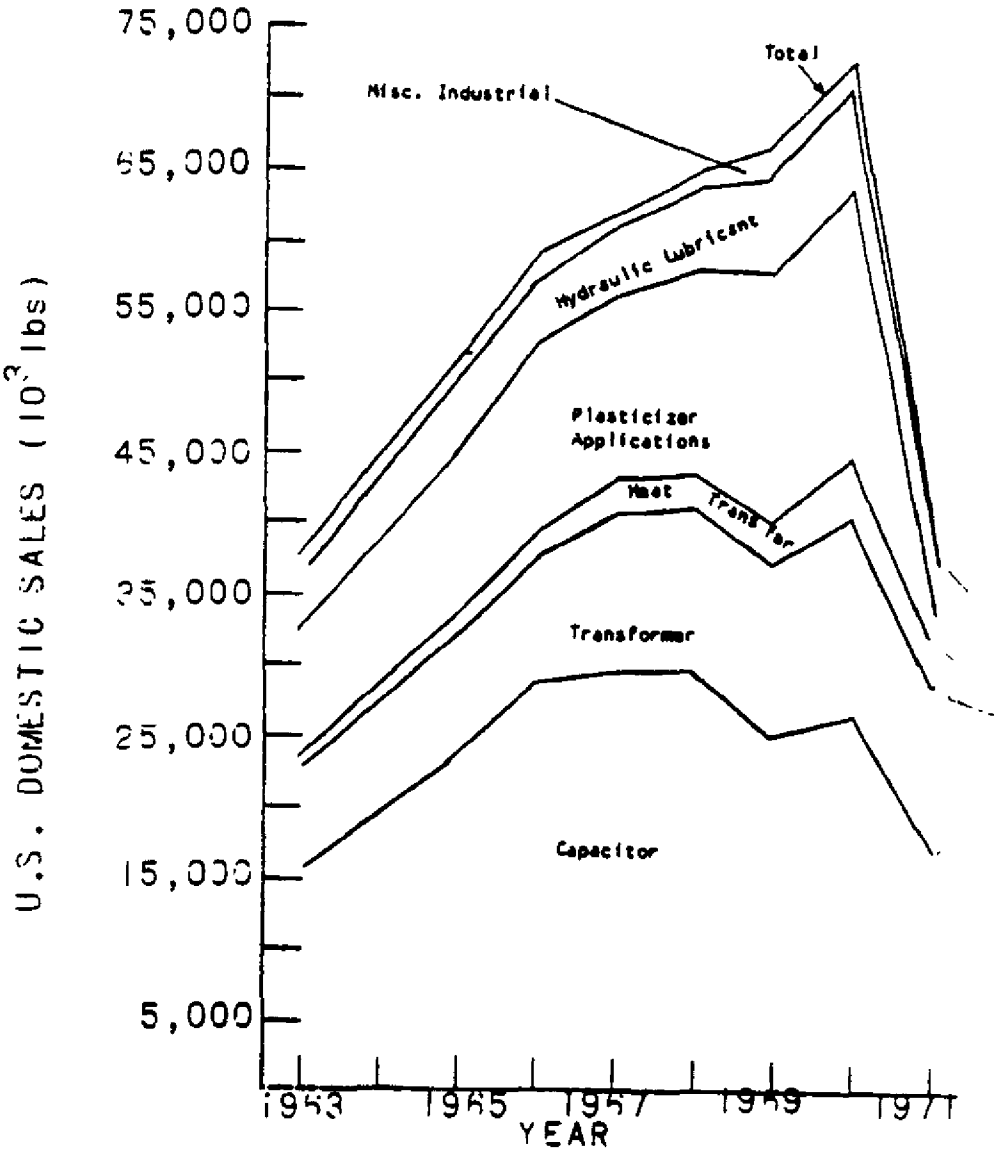

FIGURE 2. US DOMESTIC SALES OF PCBs by Category (The uppermost curve represents the total sales.)

From Nisbet, I.C.T., and Serafim, A.F. (1)

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production and sales figures for 1971 were roughly half of those for 1970, when these volumes were at their peak (Table 1 and Figures 1 and 2). Projections for 1972 indicate an even lower volume.

Prior to 1971, about 40 percent of the PCB material in the United States was used in applications where containment was difficult and losses into the environment were probable. These uses included plasticizers, hydraulic fluids and lubricants, surface coatings, inks, adhesives, pesticide extenders, and microencapsulation of dyes for carbonless duplicating paper. The remaining 60 percent of domestic sales was used mainly in electrical applications (transformers and capacitors). In 1971, this fraction is expected to have reached approximately 90 percent of the total use, only about half of the total use in 1970.

In terms of the grade or family of PCB manufactured, the lower chlorinated species have generally made up the majority of the products produced. From the figures in Table 1 it can be seen that Aroclor 1242 and grades with lower percentages of chlorination characteristically composed one half or more of the total production between 1963 and 1970.

The largest categories of use of PCBs have been in capacitors and transformers and in certain "plasticizer" applications including carbonless duplicating paper. A large percentage of the production of Aroclor 1242 went into these three categories of products. (2) The major uses for PCBs prior to 1970 (in the order of importance as a reflection of the volume of material used) were:

Capacitors
Plasticizer applications
Transformer fluids
Hydraulic fluids and lubricants
Heat transfer fluids

II. CHEMICAL AND PHYSICAL PROPERTIES AND IMPURITIES

Chemical and Physical Properties of PCBs

Theoretically, there are 210 possible PCB compounds, but only about 100 are likely to occur in commercial products. The degree of chlorination determines the chemical and physical properties of the Aroclors; the first two digits of the numbered Aroclor represent the molecular type, the last two digits the average weight percent of chlorine. Their physical state thus varies from colorless, oily liquids to more viscous and increasingly darker liquids to, in the higher series, yellow and then black resins. The PCBs are not readily biodegradable. They resist breakdown by water, acids, and alkalis and have boiling points ranging from 278 to 475°C.

Analytical Techniques

Whereas in the past it was difficult to identify PCBs in the presence of other organochlorine compounds such as DDT and DDE, they can now be separated from interfering compounds and identified and measured by means of thin layer and gas liquid chromatography at levels less than 1 part

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per million in food and at significantly lower levels in air and water. Confirmation of their presence and molecular structure is possible by mass spectrometry. Various chromatographic columns and GLC detectors have been most useful in the analyses. Increased precision of residue detection in biological materials has also been made possible through the choice of chlorine specific detectors such as the microcoulometric detectors.

Contaminants and Impurities

The starting materials used in synthesis of PCBs determine to a large degree the type of impurity or contaminant in the commercial product. The contaminant variation, of course, renders some divergence in the LD 50 values or other toxicologic response of the PCBs. Fractionated samples of some PCBs of foreign manufacture have shown them to contain as contaminants the tetra- and pentachlorodibenzofurans, the hexa- and heptachloronaphthalenes. Further work is needed to ascertain whether additional impurities or contaminants are present in the various U. S. and foreign PCB products. Also, variance in biological response to the various PCB products should be correlated with analytical data obtained on the actual or likely presence of contaminants.

III. BENEFITS, UTILITY, AND ESSENTIALITY

The task force reviewed the several categories of uses to which PCBs had been put in the past to determine what was known of their utility and to ascertain if alternate or substitute materials were available or whether any of the present applications were essential.

The four major types of applications examined were:

1. Dielectric fluids for capacitors and transformers.
2. Industrial fluids for hydraulic, gas turbine, and vacuum pump uses.
3. Heat transfer fluids.
4. Plasticizers and miscellaneous uses.

This review of utility was undertaken by the National Bureau of Standards. The review was materially aided by information from the National Industrial Pollution Control Council and from certain professional independent testing and evaluation associations.

A major value of the PCB liquids is that those with four or more substituted chlorines per molecule are nonflammable as are their decomposition products, both vapors and arc-formed gaseous products. Thus they can be used as fluids at temperatures up to 700°F without the danger of explosions and fire. The major disadvantage of the PCBs is their toxicity and environmental contamination. The other comparable class of non-flammable fluids is the fluorocarbons, which typically have a lower vapor pressure and lower boiling point than the chlorinated compounds.

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Electrical Uses

PCBs are used in fluids (known as askarels) for electrically insulating and cooling transformers when the transformers are used in or near buildings. Being virtually free of fire and explosion hazards, PCBs can be used where failures of oil-insulated transformers would present a potential danger to life and property. PCBs also are superior to oils in reliability, in making small equipment possible, and in assuring long life and reliability to equipment. Table 1 shows the flammability ratings of two PCBs compared to five other common materials.

Table 1

Underwriters' Laboratories Flammability Ratings

Fluid	Flammability Rating
Ether	100
Gasoline	90-100
Ethyl Alcohol	60-70
Kerosene (100° F.P.)	30-40
Mineral Oil	10-20
Aroclor 1242 and MCS 1016	2-3

PCBs are used in transformers wherever fire protection is particularly important--for about 5 percent of all transformers.

Most of these transformers are located inside public, commercial, or industrial buildings--or on the roof tops of, or in close proximity to, such buildings--and require no special enclosures other than those necessary to prevent accidental hazardous mechanical or electrical contact of persons with the equipment.

The amount of Aroclor used in various types of transformers ranges from 40 to 500 gallons (516 to 6,450 pounds) with an average of about 235 gallons (3,032 pounds). During 1968, the last complete "normal" year for the electrical industry, the total amount of PCBs used in new transformers or as replacement fluid was approximately 1.3 million gallons (8.4 thousand tons).

The only present alternatives to Aroclor-insulated transformers are mineral oil-insulated transformers or dry-type transformers (either those open to the atmosphere or those that are gas-filled and sealed). Mineral oils are the preferred fluids when fire does not create a hazard. Dry transformers also can be used when space is available to install them. Fluorocarbon liquids require a special transformer design.

PCBs are used in more than 90 percent of the electric utility (large power) type and smaller industrial type capacitors made today. They are needed for safety, reliability, and long life, and to achieve sizes compatible with equipment and installation requirements.

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Almost 80 million PCB-impregnated capacitors are manufactured annually, most of them for first-time use. The principal types are high voltage power capacitors used primarily for power factor correction in the distribution of electric power; low voltage power capacitors installed in industrial plants at the load (typically large motors); ballast capacitors to improve the efficiency of lighting systems; and small industrial capacitors for power factor improvement in such equipment as air conditioning units, pumps, fans, etc.

Capacitors used in lighting and air conditioning applications contain 0.0005 to 0.09 gallons of PCB per unit. The largest power capacitors contain about 6.7 gallons of askarel. The National Electrical Code requires that any installation of capacitors in which any single unit contains more than 3 gallons of combustible liquid shall be in a vault like that required for transformers. During 1968, the last complete "normal" year for the electrical industry, the amount of PCBs used in capacitors was approximately 14.4 thousand tons.

Possible alternatives to PCB-impregnated capacitors are capacitors impregnated with mineral oil or certain other liquids. Flammable fluids in capacitors used in buildings are not allowed by insurance companies and building codes.

If codes did allow flammable materials in this use, replacement of PCBs in capacitors and transformers would require considerable time and money for re-engineering, manufacture, and application of substitute equipment, and lack of availability of PCBs for this equipment would cause a major and lengthy disruption in the nation's electrical system.

Industrial Applications

PCBs have been useful in hydraulic systems where leakage onto hot metal surfaces could cause fire, but substitute fluids are available. Gas turbines require lubrication at high temperatures. PCBs can be used but tend to be corrosive. Phosphate ester lubricants seem better in this respect. Chemical stability is more important than non-flammability for high temperature lubricants. PCB fluids are useful in diffusion booster pumps, but non-flammability is not especially important for diffusion pump liquids, and alternative liquids are available.

Heat Transfer Materials

Flammable heat transfer fluids present a fire hazard if they leak into a furnace or onto hot surfaces. The use of PCBs prevents this danger. In some cases water is a suitable substitute at moderately high temperatures, and other satisfactory heat transfer fluids are commercially available and in use.

Plasticizers

The PCBs are good plasticizers for use with adhesives, textiles, surface coatings, sealants, and copy paper. In some cases the PCBs act as fire retardants. There are no unique properties of PCBs for plasticizer uses, and equally effective alternatives are generally available (e.g., phosphate esters are often used as fire retardants).

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IV. OCCURRENCE, TRANSFER, AND CYCLING IN THE ENVIRONMENT

Given the diversity of uses of PCBs and their chemical characteristics (greater stability in the higher chlorine species), it is not surprising that the residues are widespread. While satisfactory quantitative estimates of the contribution of various pathways into the environment are not possible with existing data, there are enough data to be certain that PCBs do reach the environment at least from the following sources:

-- Open burning or incomplete incineration (at usual temperatures) of solid wastes, municipal and industrial. Incineration at 2000°F or above for two seconds will destroy PCBs, but poorly operated incinerators or open burning may result in PCBs being released to the atmosphere unchanged.

-- Vaporization from paints, coatings, plastics, etc. (Nisbet and Sarofim, 1) estimate that as much as 20 percent may be vaporized.

-- Municipal and some industrial sewers (PCBs present in treated as well as untreated wastes).

-- Accidental spills or improper wastes disposal practices.

-- Formerly, direct application to the environment as ingredients of pesticides or as carriers for pesticides (such uses of PCBs are now prohibited).

-- Dumping of sewage sludge, municipal and industrial solid waste, and dredge spoil at sea.

-- Sewage sludges disposed of on land.

-- Migration from surface coatings (paints, etc.) and packaging materials into foods and feeds.

Probably the largest amounts of PCBs circulating in the environment reach it through industrial and municipal discharges to inland and coastal waters.

The recommendation by the task force that "more scientific information about PCBs is needed" is illustrated by the sparsity of knowledge about PCBs in the environment. Only general statements can be made about how PCBs reach the environment, how they reach target organisms, and how much is present.

Nisbet and Sarofim (1) estimate that the total loss of PCBs into the U. S. environment over the last 40 years would approach 30,000 tons to the atmosphere, 60,000 tons to water and 300,000 tons to dumps. Of this total, remaining residues might be 20,000 tons from the air (which would be distributed on land or water), 30,000 tons in water, and perhaps 250,000 tons in dumps.

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Thousands of environmental and biological samples have been analyzed for the presence of PCBs. One or more of the PCB compounds have been detected in all environmental media, and in many organisms.

Water

The water environment is probably the principal sink and transport mechanism for PCBs. Calculations based on measured occurrences in municipal and industrial outfalls, in the receiving waters, and in the downstream reaches of the waterways demonstrate transport through the aquatic system. Measured residues in fishes from various environments suggest accumulations at the downstream ends of the drainageways.

There are few data on removal, disappearance, and sequestering of the substances in soils or bottom sediments of rivers, lakes, estuaries, or the ocean.

Organisms Other Than Man

PCBs being, like many of the organochlorine insecticides, fat soluble, are stored in the lipids of animals. Also like the chlorinated hydrocarbon insecticides, they resist metabolic changes, and tend to be concentrated at succeedingly higher levels in animals higher in the food chain. The higher chlorine PCBs are the most stable.

Occurrence and Sources of PCBs in Food

The identification of PCBs as a potential food contaminant was first reported in 1966. Subsequent investigations, including the development of analytical procedures for PCBs in foods and their incorporation in Federal programs for monitoring the nation's food and feed supply for pesticide residues and other chemical contaminants, established several sources from which foods may become contaminated with PCBs.

Environmental Contamination of Food

PCB residues in fresh water fish appear to be widespread geographically as a result of the environmental contamination of lakes and streams. Depending upon the location of sampling and the species of fish, PCB levels generally range from 1 to 10 parts per million. Foods of animal origin, such as meat, poultry, eggs, and milk contain, in some instances, low background levels of PCBs that may be attributable to environmental contamination.

Industrial Accidents

The widespread industrial uses of PCBs have resulted in a number of identified isolated accidents involving the direct contamination of animal feeds, which, in turn, caused human food to become contaminated.

-- Poultry and eggs became contaminated as a result of the leakage of PCB heat transfer fluid during the pasteurization of fish meal (poultry feed component).

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PCB residues in milk have resulted from the use of PCB in certain coatings on the inside walls of silos, which, in turn, contaminated the dairy feed silage.

-- The use of spent PCB transformer fluid as a herbicide spray vehicle allegedly contaminated dairy cattle grazing areas thereby causing residues in milk.

-- The grinding of bakery products along with their PCB-containing wrappers for use as poultry feed is suspected to have caused contamination of fowl.

These incidents, as well as others during the past several years, represent localized sources of contamination. Federal, State, and industry actions prevented most of the contaminated foods from being marketed.

Food Packaging

A significant percentage of food paper packaging materials contains PCBs and has resulted in the migration of low levels to the packaged food. This source of food contamination was identified in 1971. The origin of PCBs in packaging materials is not fully understood. Recycled waste paper containing PCB carbonless "carbon" paper is the prime source of PCB in paperboard product. Virgin paper products, however, have also been shown to contain PCB residues, probably as a result of the paper manufacturing processes. Data on current production of food packaging materials indicate that the levels are decreasing and are controllable so that the potential for PCB contamination of packaged foods can be minimized.

Dietary Intake

National monitoring data, and in particular FDA's total diet studies, indicate that the human dietary intake of PCBs is of a low order. For example: the dietary intake expressed as mg/kg body weight/day, and based on food consumption approximately twice as high as the normal diet, was less than 0.0001 in FY 1971 and 0.0001 in the first-half of FY 1972. As a point of reference, from 1965 to 1970 dietary intake of DDT was 0.0007 mg/kg body weight/day. Other investigations further disclose that except for unavoidable background levels in certain foods, the PCB contamination of food can be significantly reduced or eliminated through appropriate controls.

Man and the Ecosystem

In air and water away from immediate sources of waste discharge, levels of PCBs are low -- a few micrograms per cubic meter (parts per trillion; ppt) in air and less than a part per billion (ppb) in fresh water; soil or bottom sediments contain a few parts per billion, up to several hundred parts per million (ppm) near some industrial outfalls; from tenths of a ppm to tens of ppm in fish and up to hundreds of ppm in some fish and birds near the top of the food chain. To illustrate these relationships, 1/8 of an inch is about

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one trillionth of the distance to the moon; and a part per million is about 5 steps on a walk from Washington to San Francisco.

Man, who is at the top of a food chain, may also have PCB residues in his body fat. Analyses of tissue residues from 688 persons from three States showed two-thirds to have detectable residues, but only one-third contained residues of 1 part per million or more.

PCBs have been shown to accumulate in fish and aquatic invertebrates to levels of 75,000 times that present in the water, and to be accumulated from concentrations as low as 0.06 parts per billion (the lowest concentration for which experimental data are available). Thus, to keep levels in fish as low as possible, and in any case from reaching the 5 parts per million established by FDA as an interim action level for safety as food, concentrations in water should be less than 0.07 part per billion, or to allow some safety factor, 0.01 ppb. This level in water should be sufficiently low that fish and shellfish are not themselves adversely affected.

Existing data suggest that the principal route of PCBs through the environment is from waste streams into receiving waters, downstream movement in the waterways in the water and on sediments, accumulation from the water by aquatic organisms, and transfer to birds and mammals (including man) through residues in fish that are eaten.

Another route to man is through migration of residues to foods from PCB containing packaging materials. A third route to man may have been absorption through the skin from handling carbonless carbon paper. These exposures are being rapidly diminished since PCBs are no longer used in carbonless carbon paper. Presumably most of the PCB residues in paper made from waste paper also came from used carbonless carbon paper, which is no longer used in making food packaging material.

V.A. BIOLOGICAL EFFECTS ON MAN (METABOLISM, TOXICOLOGY, AND RESULTS OF HUMAN EXPOSURES)

Human beings occasionally have been exposed to high levels of PCBs. Some exposure has been the result of occupational experience or of accidental concentrations in food as in the accidental contamination of rice oil in Japan ("Yusho" episode). As far as can be determined, the number of exposed persons in these cases has been limited. Another source of contamination and exposure (although at a lower level) has been fish containing PCBs.

Samples of human fat have been examined to a limited extent for the presence of PCBs. As a result of this limited sampling, it has been concluded that some persons carry a body burden of PCB in their fat tissue. In contrast to the ubiquity and levels of DDT and its metabolite, DDE, in humans in this country, the current levels of PCBs do not appear to be as uniform in distribution. At the levels in which they are found, PCBs do not appear to present an imminent hazard.

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The acute toxicity of commercial PCBs in experimental animals appears to be low. In the case of the human exposure with the Yusho episode, the average dose to that exposed population was calculated as 2 gm. From this incident, it was estimated that the minimum dose necessary to produce positive clinical effects was 0.5 gm.

With a sufficiently high dose it is possible to distinguish a number of toxic actions of PCBs and their contaminants in mammals. Alterations in the functioning of the liver have been observed in a number of species, and these are attributed to PCBs. It is likely that other conditions, such as chloracne (severe skin eruptions), liver damage, and hydropericardium (accumulation of fluid in the sac which surrounds the heart) may be caused by a contaminant, chlorinated dibenzofuran.

The limited mammalian chronic studies of the Monsanto Company indicate no evidence for carcinogenicity. The possibilities of embryotoxicity and mutagenicity, however, are poorly studied and, hence, are ill-defined.

Because of the possib lity of human exposure to PCBs, the task force recommends the following additional studies:

1. Toxicological evaluation of a select number of representative, purified PCB isomers as well as purified trace contaminants such as the chlorinated dibenzofurans.

2. Definitive mammalian elaboration of the kinetics, absorption, distribution, metabolism, and excretion of the technical PCBs as well as a number of key isomers and the chlorinated dibenzofurans.

3. Elaboration of the subcellular and intracellular actions of the technical PCBs as well as a number of representative isomers and chlorinated dibenzofurans.

4. More definitive epidemiological studies of the PCBs with both more representative population sampling and standardization on the basis of lipid content of the tissues.

V.B. BIOLOGICAL EFFECTS ON ANIMALS OTHER THAN MAN

The significance of PCBs to wild animals depends primarily upon the sublethal physiological effects of these substances rather than upon their lethal toxicity. They have accumulated in all portions of the natural environmental complex in a manner predictable from their high solubility in fat and their resistance to degradation.

PCBs can be lethally toxic to some fish and aquatic invertebrates when concentrations in the water are parts per billion or less. They are metabolized and excreted very slowly by these organisms.

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They are only moderately toxic to birds and mammals; lethal levels are similar to those of DDE. PCBs may have contributed to direct mortality of some adult birds in the field, but not to an extent to affect populations.

In sublethal exposure, PCBs are physiologically active and induce enzyme activity. Direct effects on reproduction have been shown for chickens, but not for ducks, quail, or doves. Some studies tentatively suggest the possibility of subtle behavioral effects and of interactions with disease organisms or other environmental chemicals.

Full evaluation of actual or potential effects in the environment is hampered by the complex nature of the mixtures that compose PCBs, and by the inclusion of contaminants in these mixtures. As experimental studies have been conducted with the unaltered products, as sold, the results may not properly reflect the effects of the components as they exist in the environment.

Although fully conclusive data are not available, the evidence for toxic and physiological effects indicates that the PCBs must be viewed as potential problems at present environmental levels.

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FOOTNOTES

1. Nisbet, I.C.T., and A.F. Sarofim, "Rates and Routes of Transport of PCBs in the Environment". Paper delivered at International Scientific Meeting on PCBs sponsored by the National Institute of Environmental Health Sciences, and held at the Quail Roost Conference Center, Rougemont, North Carolina, December 20-21, 1971. (Environmental Health in Perspective (in press) 1972.)

2. Data supplied by the Monsanto Company.

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APPENDIX A

Chemical and Physical Properties of PCBs

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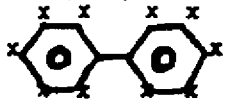
APPENDIX A

Chemical and Physical Properties of PCBs

I. Chemical and Physical Characteristics

The PCBs (trade name Aroclors in the United States, unknown in Soviet Union, Phenoclor in France, Colphen in Germany, and Kanachlor in Japan) are manufactured in the United States primarily by Monsanto Chemical Company. There are also suppliers in Europe and Japan. Because of their unique chemical and physical properties the PCBs have been widely used in paints, electrical transformers, condensers, non-inflammable oils, adhesives, plasticizers, heat transfer systems, hydraulic fluids, caulking materials, printing inks, and many other uses where the nonflammability and heat resistance properties are useful. Monsanto Chemical Company, reacting to the concern about extensive environmental contamination by the Aroclors, have recommended discontinuance and curtailed uses in equipment or products which inadvertently lead to contamination of the environment (food products, potable water supplies, and as an air pollutant). Presumably the history of the polychlorinated biphenyls started in 1930 when an industrial use of non-flammable oils was introduced for electrical transformers, condensers, and paint. It was probably not until the mid-sixties that an awareness of the environmental contamination came about with the realization that after 40 years use of the Aroclors, there was as extensive a problem of contamination as with the organochlorine pesticide DDT. Swedish scientists drew attention to the fact that PCB has been found in fish and birds in their surveillance in 1966, and soon this alerted investigators in other countries to the problem. Surveillance of total diets by FDA failed to report any PCB in fruits and vegetables.

Perhaps the accumulation of PCBs in environmental substrates or living organisms can be associated with the particular chemical and physical properties of these series of synthetic chlorinated aromatic compounds. For example, the nonenvironmental degradability or biodegradability accounts for it as a residue in many media and for its persistence. Like DDT, closely related structurally, it will enter the organism, be stored in the depot fat, and thus be transferred through the food chain at increasing concentrations. The basic structure of PCBs is shown below where x represents any number of possible positions for chlorination leading to about 210 possible combinations, of which 102 are probable. (Widmark, 1), who made this calculation in developing



criteria for these limitations, noted that the criteria were based on compounds containing five to eight chlorine atoms per molecule and the number of chlorine atoms per ring differing by not more than one.

The Aroclors may consist of chlorinated biphenyls, chlorinated terphenyls, or a mixture of these compounds. Invariably, although a specific numbered Aroclor may represent a molecular type and degree of chlorination or weight percent of chlorine, the product is a mixture of compounds in a series such as 1200, 2500, 4400, and 5400. The first two digits represent the molecular type,

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and the last two digits give the weight percent of chlorine. For example:

1200 - chlorinated bipheynls

2500 - blend of chlorinated bipheryls and chlorinated triphenyls (75:25)

4400 - blend of chlorinated biphenyls and chlorinated triphenyls (60:40)

5400 - chlorinated triphenyls

Thus Aroclor 1242 would be a chlorinated biphenyl containing 42 percent chlorine. These biphenyls produced by Monsanto range from 21 to 68 percent chlorine. To refer back to the existence of many possible isomers, it is of interest that Aroclor 1260 would show the presence of 11 isomers; five containing six chlorine atoms, five containing seven chlorine atoms, and one containing eight chlorine atoms (2). Bagley, et al, (3) studying Aroclor 1254, observed 18 distinct compounds. However, as previously stated, the number of compounds present or identified by mass spectrographic studies is much less than theoretically deduced.

The polychlorinated biphenyls which are chemically inert were described in the literature back in 1881 by Schmidt and Shults (4) but achieved by Swann Company in 1930 and fully developed for industrial use in that year. During the 40-year era, 1930-1970, it was discovered that Aroclors could be used to extend the effectiveness or lethality of organochlorine insecticides such as chlordane, aldrin, and dieldrin in pesticidal formulations, thus enhancing the possibilities for proliferation into the environment (5). Additionally, there were indications that PCB had a synergistic effect on lindane (6).

The Aroclors, as previously stated, are chemically inert, making them ideally suited for certain industrial uses. They are not hydrolyzed by water and resist alkalis, acid, and corrosive chemicals. Since they are not volatile, their boiling points range from 278 C for Aroclor 1221 to 451°C for Aroclor 1268. They are stable to long heating and can be distilled at ordinary pressure without any carbonization or decomposition. As might be expected, since they are insoluble in aqueous media, they are quite soluble in hydrocaroon solvents. It is believed that PCBs are more stable than DDT and metabolites and, accordingly, resistant to biodegradability or biological decomposition. The proximity of the aromatic rings probably accounts for the lack of degradation or transformation as with DDT, which has an ethane linkage intervening the aromatic nuclie.

PCBs and formulations thereof have a wide range in viscosity and physical state, from colorless mobile-like oily characteristics to yellow-green clear mobile oil, to light yellow viscous oil, to light yellow soft sticky resin, to white powder, to light yellow clear brittle resin, to yellow transparent sticky resin, to clear yellow-amber brittle resin, to a black opaque brittle resin. Other properties such as low solubility in water and high dielectric constants make them versatile for industrial uses. Many of these

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PCB preparations have strong adhesive properties, and it is this use in bonding of paper and cardboard in certain packages for food, plus reuse of printing paper in manufacture of grayboard, that has led to a few problems of contamination of certain food products. A rather complete compilation of these properties is listed in the attached table from a report by Monsanto Company.

Table I

GENERAL PHYSICAL PROPERTIES OF THE

AROCLOR CHLORINATED COMPOUNDS

Form;	Aroclor 1221 Colorless mobile oil	Aroclor 1232 Practically colorless mobile oil	Aroclor 1242 Practically colorless mobile oil	Aroclor 1248 Colorless to light yellow-green, clear, mobile oil	Aroclor 1254 Light yellow viscous oil	Aroclor 1260 Light to dark yellow sticky resin
Color	50 Max (APHA)	50 Max. (APHA)	60 Max. (APHA)	50 Max. (APHA)	50 Max (APHA)	50 Max (APHA)
Acidity Maximum (as HCl per cent)	0.01%	0.01%	0.01%	0.010	0.010	0.010
Average molecular weight	0.0071 (25°-65°C)	0.0077 (25°-65°C)	0.00968 (25°-65°C)	0.00966 (25°-65°C)	0.00967 (25°-65°C)	0.00967 (25°-65°C)
Viscosity, cs at 38°C (100°F) Specific Gravity Pounds per gallon 25°C (77°F)	32.1-192 (25°/15.5°C) 9.85	4.270-1.280 (25°/15.5°C) 0.95	1.381-1.392 (25°/15.5°C) 11.50	3.405-1.415 (65°/15.5°C) 12.06	1.095-1.505 (65°/15.5°C) 12.82	1.151-1.566 (65°/15.5°C) 13.50
Distillation Range ASTM D-20 (Max.) Corr. C	275° 320°	290°-325°	325°-366°	360°-375°	385°-390°	385°-420°
Evaporation Loss - % ASTM D-6 Mod 212°C 302°F	5 hrs 0 hrs	1.0 to 1.5	1.0 to 1.5	3.0 to 4.0 0.0 to 0.1	1.0 to 2.0 0.0 to 0.2	5.0 to 7.0 0.0 to 0.1
Flash Point Cleveland Open Cup....	°C 176° °F 284-302	176°-190° 352°-310°	176°-186° 348-366	199°-199° 379°-384°	None	None
Fire Point Cleveland Open Cup.	°C 178° °F 352°	238° 460°	None	None	None	None
Pour Point - ASTM D-97	°C Crystals at 10° °F Crystal. 14°F	-35 5° -32°	-19° --	7° 19.5°	10° 50°	11° 36°
Softening Point - ASTM E-28	°C - °F -	- -	- -	-	-	-
Refractive Index 0 line - 20°C,	1.617 1.618	1.620-1.627	1.627-1.639	1.630-1.641	1.639-1.648	1.647-1.649
Viscosity Saybolt Universal Sec (ASTM - D-88)	210°F (98.9°C) 30-31	34-38	36-39	36-37	44-48	72-78
	130°F (54.4°C) 35-57	39-61	49-56	73-80	260-360	1700-6500
	100°F (37.8°C) 38-61	44-91	82-92	185-260	1000-2500	-

NOTE: Indicates the fire point up to boiling temperature

Oral LD50-rats (approx.) mg/kg	1960+	4470+	8650+	11,000+	11,900+	10,000+
Skin MLD rabbits - mg/kg	> 7000+	>12600+	> 7940	> 7940	> 12600+	> 10000+
administered	<1160+	<2000+	<1260+	<1260+	<2000+	<7000+

+Undiluted +Administered as 50% soln. in corn oil # 331/38 in corn oil 20% soln. in corn oil. ### 10% soln. in corn oil.

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50 Max. (APHA)	1 5 Max NPA (emulsion)	/ Max. NPA (emulsion)	2 Max. NPA (emulsion)	2 Max NPA (emulsion)	
0 016	0.05	0.05	0 05	0.05	
0.00006 (25°-65°C)	0.00007 (20°-100°C)	0.00061 (25°-65°C)	0 0012) (25°-99°C)	0.00099 (25°-125°C)	0.00066 (25°-65°C)
) 999-1.003 (90°/15 5°C) 13 78	1.006-1 011 (25°/25°C) 15 09	1 670 (15°/25°C) 17 91	1.670 (25°/25°C) 17.26	1.670 (25°/25°C) 17.91	1.670 (25°/25°C) 16 56
395°--25°	435° -50°	230° 180°	215°-300°	280°-335°	-
0.5 to 0 8 0 0 to 0 1	0.1 to 0 2 0 0 to 0 06	0 2 to 0 3 0.0 to 0.02	0.2 0.05	0 03 1 5 to 1 7 (at 260°-5 hrs.)	0 2 to 0 3
None	None	None	367° 477°	None	None
None	None	None	> 350°	None	None
35° 30° 95°	- -	-	46° 135°	- -	- -
-	150° to 170° (mold pt.) 300° to 340° (mold pt.)	60° to 66° 160° to 151°	66° to 92° 115° to 126°	90° to 105.5° 208° to 221°	66° to 77° 149° to 162°
1 6501-1.6751?	-	1.666-1 661	-	1 660-1 665	-
86-100	-	90-150 (290°F or 130°C)	100-160		
600-850 (160°F or 71°C) -	- -	- -	- -	- -	- -
11,300 ≈1260 ≈1160	10,900 ≈2510	16,000 2000 ≈3160	10,600 ≈1260 ≈2000	19,2000 ≈1900 -	6,3100 ≈2000 ≈3160

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II. Problems in Analytical Chemistry - Comparison of Methods

II. 1 Separation

One of the primary and early problems in the identification of the polychlorinated biphenyls (PCBs) was that of possible interference in the GLC determination of organochlorine pesticides, where the PCB occurred along with the pesticide residue. During 1969 and 1970, various investigators worked on methods for separating PCB from pesticides (7-14). An excellent treatment of the subject of PCB as a contaminant in the environment, as related to its detection in the presence of other compounds, is covered by Jensen (15).

Jensen (15), in his review, has shown that some of the earlier studies of DDT and DDE in human fat by GLC must have been inordinately high. He first identified some GLC peaks in wildlife in 1964-66 that were not reconcilable but later identified chromatograph peaks from human fat that were not attributable to DDT or metabolites of DDT, which were more nearly comparable to peaks ascribed to PCB. The possibility that these peaks could be attributed to naturally occurring constituents in fish eaten by man was discarded when it was suggested that these same peaks could come from environmental pollutants.

To further establish the then uncertain composition of the chemicals causing the false DDT peaks, Jensen (15) separated out one of the chemicals by GLC and subjected this fraction to mass spectrometry. The mass spectrometry data showed compounds with molecular weights of 324, 358, 392, and 426. The molecular weight differences or differences of 34 mass units suggested one less chlorine atom per position on a carbon atom. In essence, through calculation, he deduced that these unknown chemicals could only be polychlorinated hydrocarbons, in this case having 5, 6, 7, and 8 chlorine atoms in the molecule. He verified his conclusion by introducing a synthetic or known PCB into the mass spectrometer. He also found that PCB standard chromatogram matched those with the same retention times as observed in various samples he analyzed, i. e., eagles, fish, or other wildlife.

It is interesting to point out that failure to recognize such interferences led to spurious results and data and obviously led to the overestimation of DDT in our environment, in man, in wildlife, and aquatic organisms. Jensen (15) referred to PCB as a new pollutant, but, as stated earlier, PCB was with us in the environment since 1930 and thus it would be an old pollutant only recently correctly identified by appropriate analytical chemistry.

In earlier work in the identification of some organochlorine pesticides such as p,p'-DDT; o,p-TDE (DDD), lindane, dieldrin, aldrin, heptachlor, and lindane, some unidentified spots and peaks in TLC and GLC interfered with the detection of these pesticidal chemicals. Jensen (15) in his work extracted the compounds from biological samples and, by appropriate cleanup of some contaminants, identified the pesticides and PCBs by thin layer and gas liquid chromatography followed by mass spectrometry. In 1964, Jensen used TLC to separate the fat soluble chlorinated hydrocarbons from the rest of the sample.

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For pesticide analysis, the common detector is the electron capture detector. For sensitivity, one can determine levels at the picogram range. However, this detector, not specific for chlorine, also gives an answer for oxygen containing compounds. Although the response here is much lower, this can be counter balanced if the level of oxygen containing impurity is somewhat higher. This system has certain inherent disadvantages in that two different compounds can have the same retention time and thus be detected as one compound or the recorded peak does not need to contain chlorine since, as indicated above, the detector is not that specific (15). However, by using different columns with variant properties, one can inject a sample into the instrument and thus secure a good separation.

To further demonstrate whether a compound which is responsible for a certain peak contains chlorine, one can concentrate the sample and analyze by a less sensitive chlorine specific detector such as the microcoloumetric detector. This, therefore, enhances the specificity in this residue analysis.

When Jensen (15) analyzed human fat for "DDT" by use of two columns, he was able to separate from human fat the two "DDT" peaks into four peaks. Two of these peaks were similar to those for o,p and p,p'-DDT, but two of the peaks were unidentified. As indicated earlier, he thought these peaks were due to naturally occurring components, which would be found in the fish consumed, such as pike. He was able to rule out this premise by treating the sample with alcoholic KOH and H_2SO_4 which would chemically alter DDT but not the more stable or inert polychlorinated biphenyl. Jensen simultaneously noted that samples of pike from a certain region, containing the then unidentified component, were correlated or associated with an area of extreme pollution. Similarly, eagles that fed on pike showed this unidentified component in their tissue. The compound in the eagles had the same retention time as the pike, thus confirming that this was a problem of biological magnification rather than the mere occurrence of a natural biochemical entity.

Another speculation was that metabolites of DDT could explain the appearance of unidentified peaks. Interestingly enough, these same peaks were found in an eagle sample collected in 1943 (prior to use of DDT in Sweden), thus implying that the DDT metabolites were not the potential unknowns. In addition, mercurials were considered, but the occurrence in water, fish and pheasants did not correlate or show a consistent pattern.

A method for the separation of polychlorinated biphenyls from DDT and its analogs has been developed by Armour and Burke of FDA (16). Identification by means of a combination of high resolution gas chromatography and mass spectrometry has been carried out by three independent laboratories in Sweden (17), Holland (2) and the United States (3) in addition to those named above.

There is a need to measure PCBs at extremely low levels of the order of 1 part in 10 or less. Accordingly, the method must be both specific and highly sensitive. Hence gas chromatography, using electron capture detection, has been extensively used with occasional identification and structure confirmation by gas chromatography mass spectrometry. This involves such steps as (a) sample preparation, (b) extraction of PCBs, (c) removal of interferences, (d) concentration, and (e) final gas chromatography and measurement.

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Some biological samples require more extensive pretreatment than water or effluents from industrial plants. The measurement of PCB concentration of effluents is a simple procedure involving chromatogram of sample and then chromatograms of standard samples developed from known PCBs. For more accurate analysis, calibration graphs can be developed from known specific peaks in the standard samples (15).

In the following charts (Figures 1-6) some chromatograms of the various representative chlorobiphenyl Aroclors are presented according to Armour (18).

Some additional points might be made relevant to separation and quantitation of PCBs. First of all, in separation, the methods used prior to quantitation of residues in samples containing PCBs and chlorinated hydrocarbons fall essentially into two categories: (a) those which necessitate destruction or alteration of one or more of the compounds and (b) those which do not. Peakall and Lincer (19) have described in detail the procedures used for separation.

Briefly, the first group requires nitration ($HNO_3 + H_2SO_4$) treatment at 0°C for 5 minutes, which destroys or alters many of the organochlorine pesticides; thus PCB is left unaffected along with lindane and BHC. Some workers such as Armour and Burke (1) reported that complex chromatograms resulted after nitration, which could not be related to the unreacted DDT-PCB mixture. Thus, nitration was not pursued as a practical means of separating DDT and PCB for further analyses.

Saponification with alcoholic NaOH or KOH will dehydrochlorinate some pesticides such as Perthane, Toxaphene, DDD and DDT to their respective olafinic compounds (20).

Perhaps the more desirable technique allows for special separation of many chlorinated hydrocarbon pesticides from PCB. This involves using various columns and solvents. Another procedure is to use a series of differing polarity columns in the gas chromatograph at the time of determination (21).

II.2 Quantitation

Koeman, et al (2) measured residues in Japanese quail by using one of the peaks in a phenachlor DP6 mixture as standard. Risebrough (22) quantitated relative levels of PCBs by assuming that each PCB compound produced the same peak height with the electron capture detector as the same amount of weight by p,p'-DDE. After adding the heights of the individual peaks, the total was multiplied by a factor derived from measurements of standard solutions with EC and MC detectors. Jensen and co-workers (23) reported concentrations of PCB as the sum of all PCB components and based the estimation on several detection systems such as mass spectrometry and EC and MC detectors. In spite of all these techniques, these investigators consider the method approximate and correct only within a factor of 2.

There are other modifications of techniques, but with all the quantitation methodology available, relative estimates of concentrations of PCB are

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GAS CHROMATOGRAPHIC CONDITIONS

Figures 1 - 6
Columns: (1) 10% DC-200 on Chromosorb W HP

(2) 15% QF-1/10% DC-200 on Chromosorb W HP

6 ft x 4mm id.

200°C

120 ml N_2/min.

Detector: electron capture (tritium)

200°C

one nanogram heptachlor epoxide causes one half scale recorder deflection

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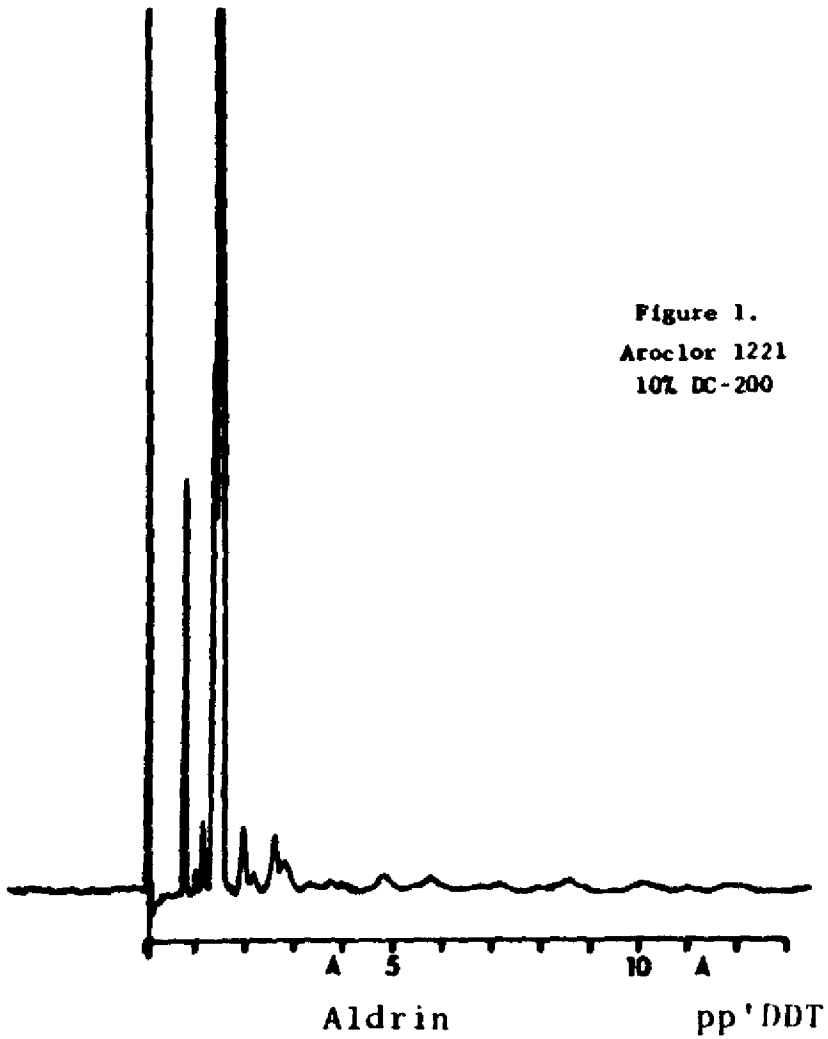

Figure 1.
Aroclor 1221
10% DC-200

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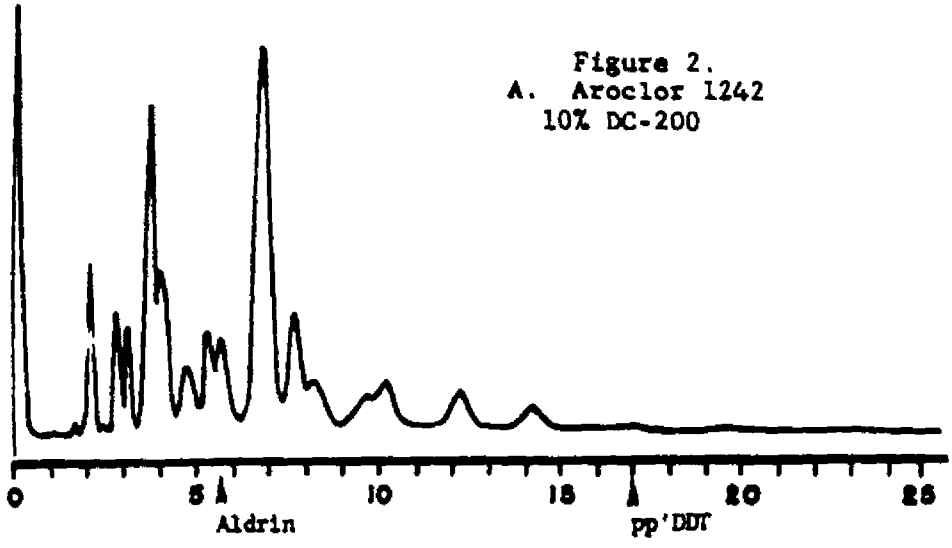
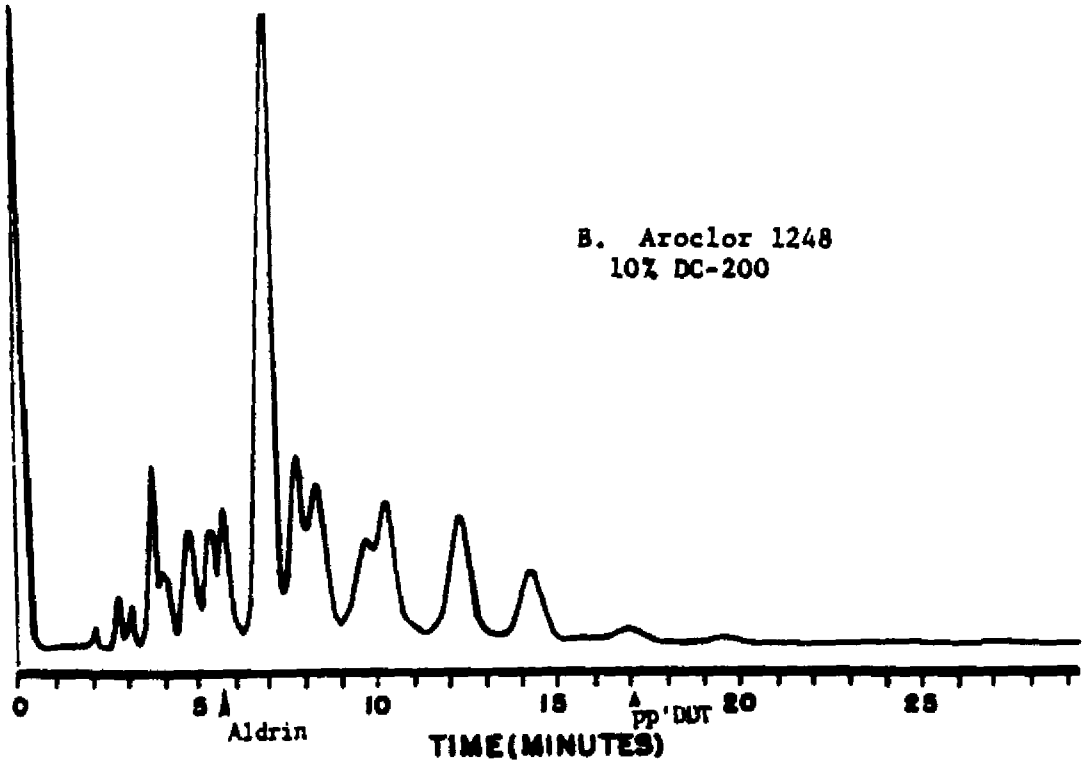


Figure 2.
A. Aroclor 1242
10% DC-200



B. Aroclor 1248
10% DC-200

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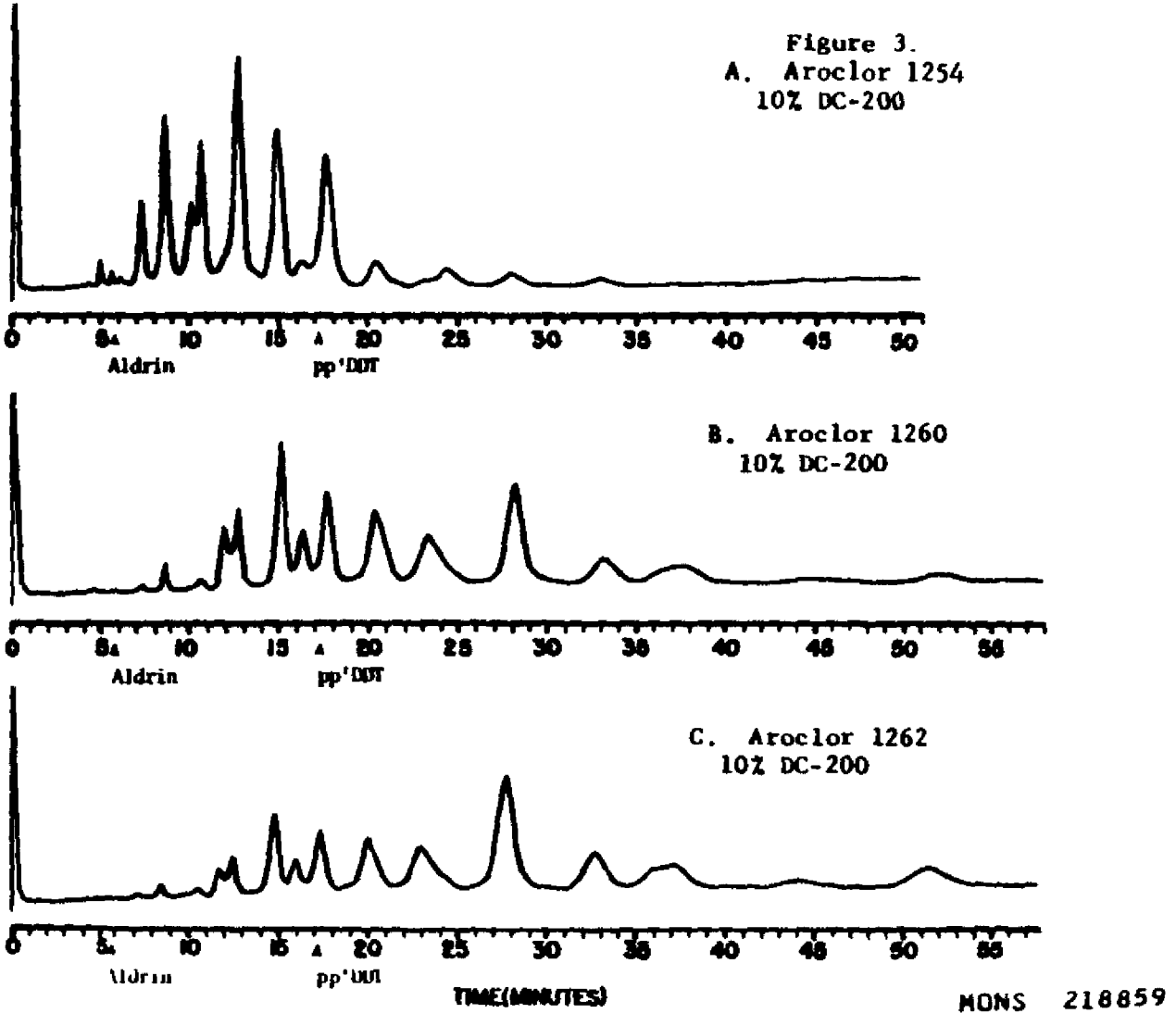

Figure 3.

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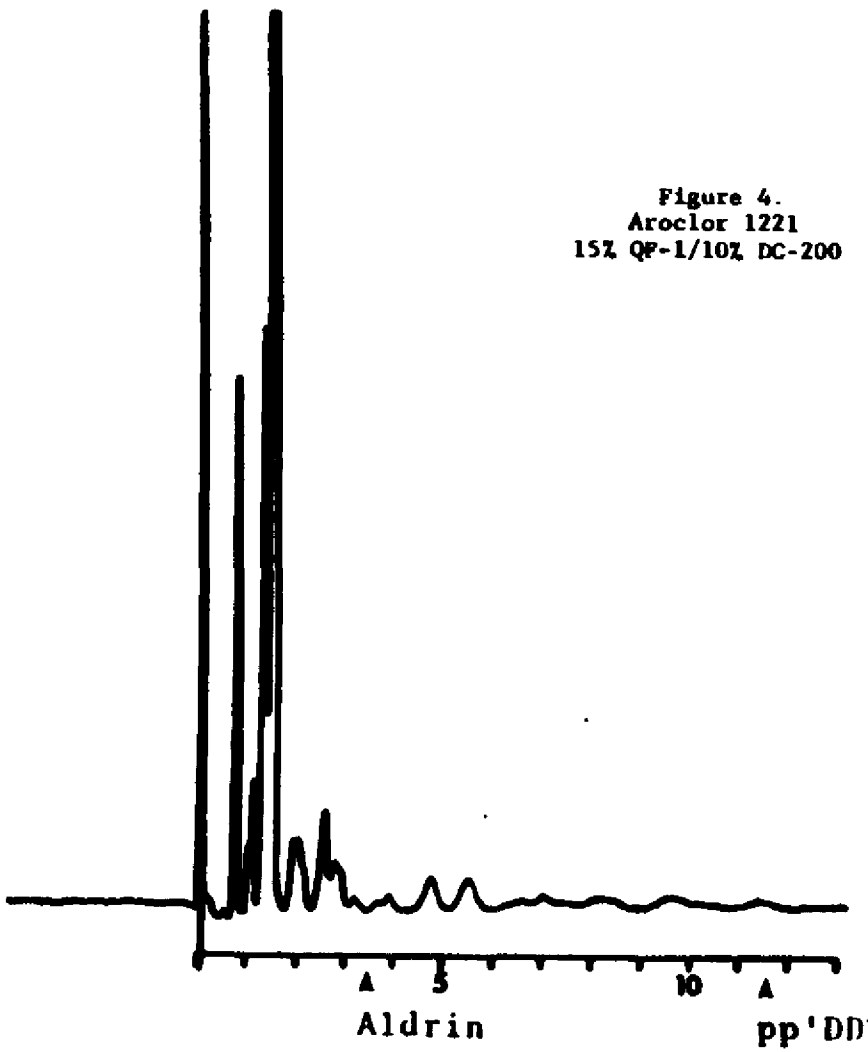

Figure 4.
Aroclor 1221
15% QF-1/10% DC-200

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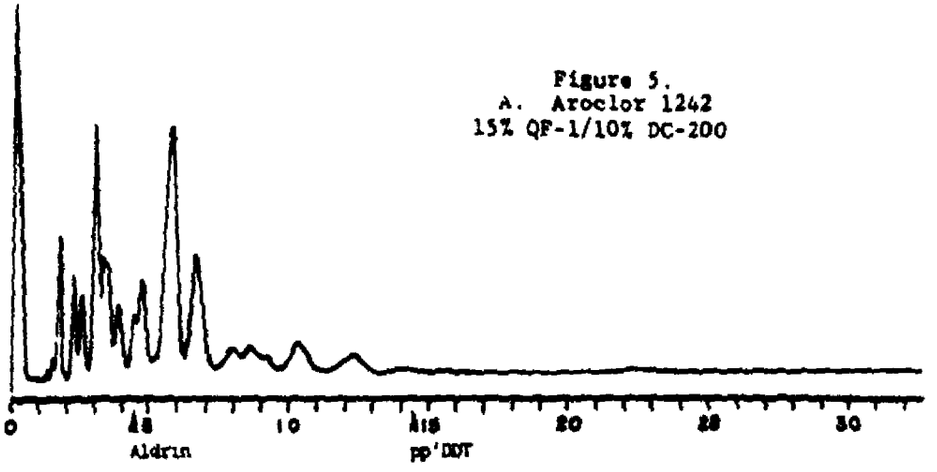
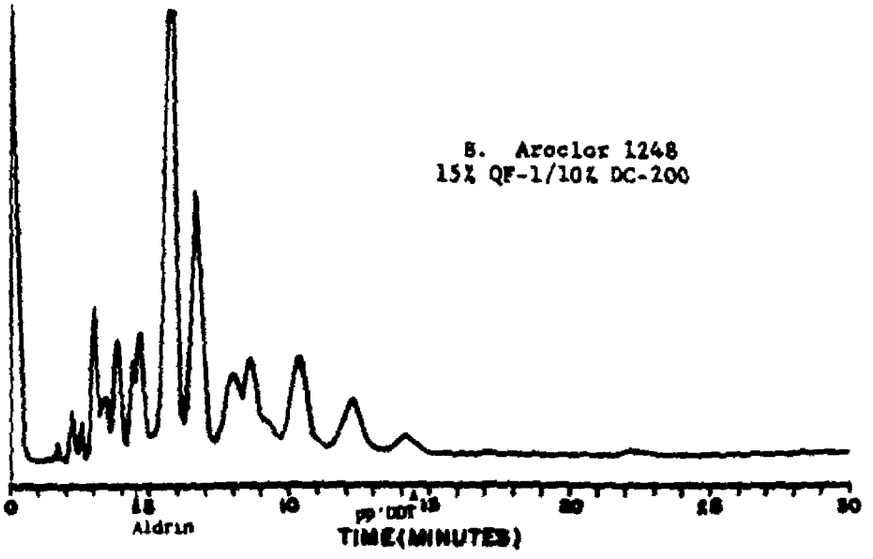


Figure 5.
A. Aroclor 1242
15% QF-1/10% DC-200



B. Aroclor 1248
15% QF-1/10% DC-200

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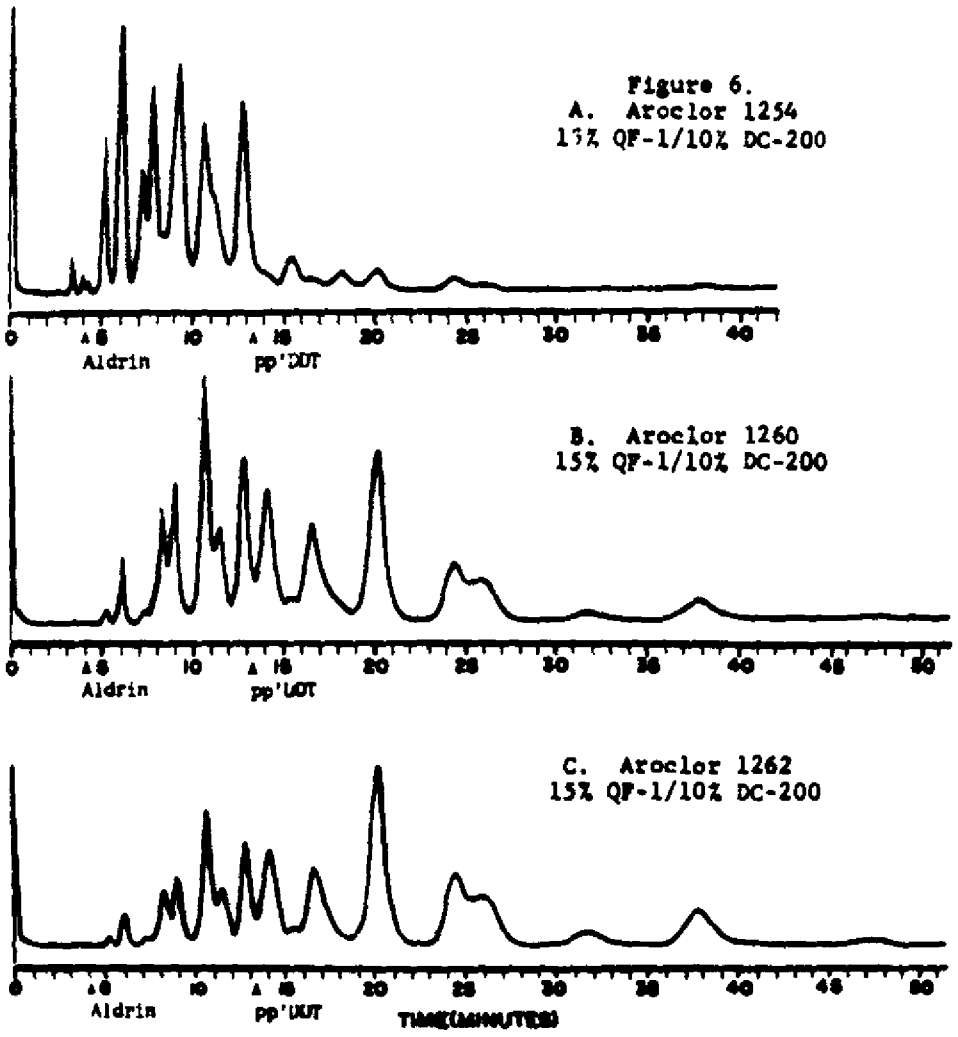

Figure 6.

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only approximate. At such time, when one is able to synthesize the individual PCB components commonly found in the environment and identify them in terms of individual peaks, then the estimation remains, as stated, a relative concentration.

However, for most biological assessment work, the correct order of magnitude and accurate relative amounts of PCB provide the requisite information for this purpose.

III. Contaminants, Impurities, or Other Chemical Moieties in PCBs

In the analysis of the polychlorinated biphenyls, one encounters a problem similar to that of the polychlorophenols and 2,4,5-T in that certain contaminants or impurities prevail. These impurities arise from the basic starting materials or compounds used in the synthesis and also from the processing conditions used in the chlorination procedures. In this respect, the series of compounds identified through GLC and mass spectrometry are somewhat similar in nature to the spectrum of dioxins found in working with chlorinated phenols, hexachlorophene, 2,4,5-T and related synthetic organic chemicals.

It has been noted in the bioassay of various Aroclors for toxicity, usually testing on chickens, that there was a variance in toxicity of certain PCB preparations. Since the occurrence of lesions resembled those of chick edema in birds fed PCB, this prompted a comparative study between three compounds, Phenoclor DP6, Clophen A60, and Aroclor 1260 by Vos et al in 1970 (24). In this study, the specific PCBs were fractionated, analyzed, and bioassayed using the chick embryo assay.

These studies revealed the presence of certain polar compounds which are present as impurities in the various PCBs and thus explain the variance in toxicity of certain commercial PCB preparations. In Table 2 some of the retentions and mass spectrometric data of some of the peaks identifying the presence of some dibenzofurans, chlorinated napthalenes, and associated chlorinated biphenyls are indicated, proving the presence of impurities.

Table 2
Relative Retentions, Mass Spectrometric Data on PCB Fractionated Sample

Peak No.	Relative Retention	Mass Nos. and No. of Cl atoms per mol	Identity of Compound
1	1.40	304 (4 Cl)	Tetrachlorodibenzofuran
2	1.58	332 (6 Cl)	Hexachloronapthalene
3	1.74	358 (6 Cl) 392 (7 Cl)	Hexachlorobiphenyl Heptachlorobiphenyl
4	2.42	338 (5 Cl) 392 (7 Cl)	Pentachlorodibenzofuran Heptachlorobiphenyl
5	3.48	366 (7 Cl)	Heptachloronapthalene

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Thus far, the dibenzofurans, the chlorinated napthalenes and chlorinated dipehnyls appear to be the major contaminants or impurities dotected in various PCB samples. It is not unlikely that other chemical moieties will be characterized as further identification work proceeds. These contaminants arise, as previously indicated, by method of manufacture and the procedure for distillation of PCB, in which NaOH can be used. Through this NaOH treatment at elevated temperatures, sequentially polychlorohydroxybiphenyls are produced and then, through loss of hydrochloric acid, the dibenzofuran derivatives result (25).

The chlorinated napthalenes are far less toxic than the chlorinated dibenzofurans (26). Thus, one might expect, with the varying ratios of impurities with variant toxicities in different PCB samples assayed for biological effects and toxicity, that the end result will depend on such factors in examining various commercial PCB preparations.

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APPENDIX B

Use and Replaceability of PCBs

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APPENDIX B

Use and Replaceability of PCBs

I. DIELECTRIC FLUIDS

Dielectric (electrically insulating) liquids are important to the electrical industry for filling agents or impregnants in transformers, capacitors, and other devices. Besides their electrical functions, the liquids may also be used for cooling and arc quenching functions. Detailed discussions of dielectric fluid applications are available (1-4).

A. CAPACITORS

Generally, industrially important capacitors use liquid impregnated cellulose paper as a dielectric. The required properties of the liquid are:

1. Non-flammability (important for preventing fires, particularly in indoor use).
2. Dielectric constant matching that of paper. A good match reduces electric field inhomogeneities, increases dielectric strength and lifetime, and allows decrease in capacitor size.
3. Low dissipation factor (reduces energy loss and destructive heating in a capacitor).
4. High dielectric strength (prevents breakdown and allows decrease in capacitor size).
5. High chemical stability (increases capacitor lifetime and stabilizes its performance).
6. Low vapor pressure (increases physical stability).
7. Inert decomposition products in an electric arc (prevents explosion or corrosion following breakdown).
8. Low toxicity of the material and its decomposition products.
9. Low cost.

1. Advantages and Disadvantages of PCB in Capacitors

The PCB capacitor liquids, commonly called askarels, are mixtures of chlorinated biphenyls and chlorinated benzenes. Several standard mixtures are specified by ASTM (5). The askarel capacitor liquids and their decomposition products are non-flammable. Thus their use in capacitors greatly reduces fire and explosion hazards. This characteristic permits economies where safety codes require fireproof enclosures for capacitors containing flammable liquids.

The dielectric constant of the askarels is high compared to other common dielectric liquids. Doubling the dielectric constant of the dielectric allows a reduction by half in the area of the capacitor electrodes, and a significant saving in the cost of construction and installation. The dielectric constant of askarels closely matches that of the capacitor paper.

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The askarels are adequate with regard to dissipation factor and dielectric strength and have good chemical stability and low vapor pressure. The breakdown products, in particular HCl, have the advantage of being non-flammable, but are highly corrosive. This dictates the use of special corrosion resistant materials inside the capacitors.

The major disadvantage of the askarels is their suspected toxicity. In ordinary capacitor usage the askarels are used in closed systems to prevent contamination from moisture. This practice also prevents the askarels from reaching the environment. However, when electrical failure occurs, sealed capacitors can leak and are ordinarily discarded.

2. Replaceability of PCB in Capacitors

Capacitors can be made dry or with gas dielectrics. Dry capacitors have inferior electrical strength to liquid-filled capacitors and, for comparable performance, must be made larger.

The major disadvantage of alternative capacitor liquids is their flammability. When comparing flash point data, as in Table 1, askarel flash points comparable to those of other capacitor liquids are sometimes listed. ASTM states that these are not true flash points but are pseudo-flash points which differ noticeably from the flash obtained on combustible materials, and such a flash point is not indicative of a fire hazard (5). The requirement of non-flammability for most capacitor uses is critical, and capacitors with flammable liquids are forbidden in many cases by the National Electrical Code (6). In other cases replacement of askarel capacitors with flammable capacitors requires use of fireproof installations (6).

The fluorocarbons are one group of non-flammable liquids which are used for some dielectric applications (1). The ones listed in Table 2 have low dielectric constants and could not directly replace askarels without increasing capacitor size. The fluorocarbons have low toxicity but the decomposition products may be toxic (1). They are generally more volatile than askarels and are considerably more expensive. The fluorocarbons are a possible replacement for PCB liquids for capacitor use, but no fluorocarbon liquid is known to be available and acceptable for this purpose.

Besides the problem of flammability, possible PCB replacement liquids generally lack either a sufficiently high dielectric constant to keep capacitor size down or a sufficiently high dielectric strength. For example (see Table 1) the silicones have the disadvantage of a low dielectric constant whereas the organic esters often have poor dielectric strength. Some silicones deteriorate rapidly under electric arcing (7).

The acceptance of a PCB substitute is a complex process involving not only users but also various regulatory groups. In most of the electrical industry, regulation is non-governmental, and the primary regulatory influence comes from Underwriters Laboratories, who test products and decide on their suitability (8). In addition, control over electrical materials is

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TABLE 1

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TYPICAL PROPERTIES OF LIQUIDS

	Mineral Oil				Polybutenes			Alkanes				
	Unsubstituted transformer oil	Capacitor oil	Pipe cable oil	Heavy cable oil	Pipe cable liquid	Paper impregnant	Capacitor liquid					
Density, SG, 25°C					1.200*	0.900	>0.900*					
37.8°C	58.2*	103*	763*	2365*				0.62	0.31	0.42	<0.40	0.25
99-100°C		38*	60*	181*	63*	176*	2 200*	0.31	0.22	0.33	0.37	0.28
Viscosity, cS, 25°C												
37.8°C	9.70	21						1.6	0.9	1.2	1.5	1.4
99-100°C		3.5	10	27				<1.0	<1.0	1.1	1.2	1.1
Flashpoint, open cup, °C	146*	154*	196.1*	243.3*	154*	360*	254*	146.1*	143.3	182.2*	132.8*	4.44
Acidity, mgKOH/gm	0*	0*	0*	0*	0.01*	0.01*	0.01*	0.010 max	0.0.0 max	0.010 max	0.010 max	0.010 max
Pour point, °C	−45.6*	−45.6*	−26.1*	−17.8*	−34*	−23*	17	1.1	−35.5	−19.0	−7.0	−9.0
Specific gravity, 15.6°C	0.868*	0.907*	0.920*	0.926*	0.862*	0.870	0.935*					
25°C								1.10	1.26	1.38	1.45	1.34
Coef of expan, cc/cc/°C	0.00063				0.00070	0.00076		0.00071	0.00073	0.00069	0.00070	0.00066
Thermal conduct, (gm cal/sec/cm²/°C/cm)	0.00031*	0.00031*	0.00030*	0.00030*								
(BTU/hr/ft²/°F)	0.076*	0.076*	0.072*	0.072*		0.062*	0.067*	0.069	0.063	0.056	0.057	0.054
Burning point, flash, min, °C								275.0	290.0	325.0	340.0	345.0
Volatility, weight loss												
Dielectric strength, kv/0.1" (0.254 cm)	32.3*	>30*	>30	>30	>35*	>35*	>35*	>35	>35	>35	>35	>35
Dielectric constant, 60 Hz												
1 kHz, 25°C								4.3	5.7	5.0	5.6	5.9
10⁶ Hz					2.14*	2.16*	2.22*					
Dissipation factor, 60 Hz	0.001*	0.001*	0.001*	0.001*	0.0005*	0.0005*	0.0005*					
1 kHz, 100°C								0.001	0.001	0.001	0.001	0.001
10⁶ Hz												
Volume resistivity, Ω-cm					>1x10¹⁴*	>1x10¹⁴*	>1x10¹⁴*	>5x10	>1x10	>1x10	>1x10	>5x10

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TYPICAL PROPERTIES OF LIQUIDS (continued)

	Fluorocarbons			Silicones			Dielectric Grade Castor Oil	Glyceryl Triacetoxy Stearate	Dibasic Esters: Butyl Stearate	Dibasic Esters: Butyl Sebacate	Butyl Naphthalate	Tetra Hydro Furfuryl Oleate	Ethylene Glycol	Silicate Ester Base
Viscosity SUS 25°C														
37.8°C		-/5[a]			360	720	180			46	40	61		
99.100°C					33/8									
Viscosity CS 25°C	2.5v		0.67	10.5	100[b]	200	500							
37.8°C	1.84	—/5.7	0.64		80	160	400			7	6	10		12.2
99.100°C	0.48	—/0.88	0.30		29	56	140	94						3.95
Flash point, open cup °C					>300	>315	>325	291		367.0	325.0	203.9	116	187.8
Acidity, mgm KOH/gm														0.5 max
Pour point °C	−50.0	−35½−84	−100.0	−90	−55	−52.7	−50.0	−23	4.4	21.7	−10.0	−17.8		<−195
Specific gravity 15.6°C	1.89	1.92/1.82	1.24											
25°C	1.88	1.90/1.79	1.22	0.960	0.970	0.935	0.973	0.9	0.995				1.1354	0.867
Coef of expan cc/cc/°C	.0017	.00064/.00036	.0016	0.00095	.00097	0.00097	0.00097	0.00066	0.00066				0.00062	0.00063
Thermal conduc.														
(cm²/°C/cm)				0.00034		0.00037							.00063	0.00327
(BTU ft²/hr/°F/in)	0.049	0.070/0.049	0.001		0.086	0.087	0.088	0.103	0.103					0.060
Boiling point at 760 mm °C	177.6	40.8/224.2	382.2										196-206	>315
Volatility weight loss				31%[c]	3%[c]	<2%[c]								
Dielectric strength, kv/.1" (0.254cm)	35 min	28/50	35 min	35[d]	35	35	35							27
Dielectric constant, 60 Hz	1.90	2.02/2.45	1.86	2.7[e]				3.76[f]	3.57[f]	3.3	4.4	3.1	4.3	
10³ Hz	1.89	2.02/2.45	1.84		2.75	2.75	2.75							2.65
10⁶ Hz[g]	1.90		1.87	2.7[e]	2.75	2.75	2.75						4.1	2.65
Dissipation factor 60 Hz	<0.0005[h]	<0.00006	<0.0005[h]	.00015[e,i]				0.06[j]	0.0047[j]	0.03	0.03	0.016	3.019	
10³ Hz	<0.0005	<0.00006	<0.0005		<0.0001	<0.0001	<0.0001							0.0242
10⁶ Hz	<0.0005		<0.0005	.00081[e,i]		0.00005				0.00013	0.00015	0.0013	0.00039	0.0042
Volume resistivity, ohm-cm	3x10¹⁷	—/>4x10¹⁶	8x10¹⁷	1x10¹⁴[d]	>1x10¹⁵[e]	>1x10¹⁴	>1x10¹⁴	5x10¹⁴[k]	6.3x10¹⁴[k]	5x10¹⁴		3x10¹⁴	<1x10⁹	9x10

- EECO ECHFCF.

[illegible]

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a ASTM D44a
b ASTM D92
c ASTM D97
d ASTM D3756
e ASTM D877 Suitability of D877 for high viscosity oils such as cable oils and polybutenes tested in cable has not been determined
f ASTM D924
g ASTM D974
h Loss per hour on a 35 gm sample on a 58 [illegible] dish at 150° for 24 hrs
i After Exposure
j As in 1169
k Weight loss after 48 hrs at 200°C
l 100°F
m 0°C
n −8°C
o ASTM D287
p ASTM D257
q 23°C
r 80°C
s 100°C
t Hz omitted
u 10⁶ Hz
v ASTM D149
w 10 Hz
x ASTM D150
y Abbreviated Name Test flash point

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Table 2

Physical and Other Properties of Lubricating Oils, Engine Oils, and Hydraulic Fluids

Fluid	Chemical Class or Compound	Viscosity, cs 100°F	Viscosity, cs 210°F	Specific Gravity (Water=1)	Flash Point °F	Fire Point °F	Autoignition1/ Temperature °F	Decomposition Temperature °F
			Mineral Oils					
MIL-[illegible]	Mineral Oil	32.2	5.8	0.86	~450	--	665(5)	--
[illegible] 44 (Gulf)	" "	87.4	9.8	0.88	~460	--	680(5)	--
[illegible] D-5731	" " - Naphthenic	--	--	--	--	--	--	640(28)
[illegible]-7277	" " "	--	--	--	--	--	666(50)	725(30)
MIL-O-6081-394	" " - Paraffinic, deep dewaxed	14	3.15	0.88	385	430	700(27)	~620(30)
Mobil [illegible]-103	Mineral Oil	124	8.74 to 10.2	0.92	390	--	702, 625(50)	--
MIL-H-6083B	" "	--	--	--	255	--	470(50)	--
MIL-H-5606A	" "	--	--	--	--	--	637(4)	--
MIL-O-5606(Esso Univis J-43)	" "	--	--	--	195	225	457(2)	--
			Glycols and Water Glycols					
Ethylene Glycol	Glycol	8.7	--	--	240	--	856(38)	--
Propylene Glycol	"	19.6	--	--	230	235	835(38)	--
Ethylene Glycol + 50% Water	Water-Glycol	2.2	--	--	--	--	903(38)	--
Houghto-Safe 271	" "	~43	~16(150°F)	1.045	--	--	767(5)	--
" " 520	" "	43.2	25.1(130°F)	1.075	--	--	--	--
" " 620	" "	43.2	29.8(130°F)	1.055	--	--	--	--
Hyvar 20(Mobil)	Water-Glycol and additives	41	--	1.07	--	--	750(51)	--
Irus 902 (Shell)	Water-Oil Emulsion	97.4	31	0.93	--	--	709(51)	--
Ucon 50HB-260	Polyalkylene Glycol	56	--	--	455	500	743(38)	--
Ucon 50HB-280-X	" "	--	--	--	500	600	745(20)	--
Ucon LB-60	" "	10.7	--	--	310	325	453(38)	--
Ucon LB-400-X	" "	--	--	--	--	--	752(20)	--
			Phosphate Esters					
Houghto-Safe 1010	Trialkyl Phosphate Ester	10.2	3.9	1.20	505	670	>1700(51)	--
" " 1055	" " "	13.0	4.0	1.145	505	680	10.0,030(50)	--
" " 1115	" " "	32.2	6.1	1.165	--	680	>1200(51)	--
" " 1120	" " "	49.8	5.0	1.15	495	690	1020(5)	--
" " 1130	" " "	62.8	8.0	1.16)	490	680	>1200(51)	--

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Table 2 (Cont)

Fluid	Chemical Class or Compound	Viscosity, cs 100°F	Viscosity, cs 210°F	Specific Gravity (Water=1)	Flash Point °F	Fire Point °F	Autoignition[7] Temperature °F	Decomposition Temperature °F
			Phosphate Esters (Cont)					
MIL-H-19457(Type S)	Triaryl Phosphate Ester	--	--	--	--	--	1040(.9)	--
Tricresyl Phosphate	" " "	38.3	4.48	1.17	470	--	1110(12)	680(48)
Trioctyl Phosphate	Trialkyl Phosphate Ester	--	--	0.926	405	--	545(13)	~380(25)
Tributyl Phosphate	" " "	--	--	--	--	--	549(12)	--
Pydraul A[7]	Phosphate Ester-Chlorinated Hydrocarbon	88.8	5.0	1.36	450	745	1148(5)	--
Pydraul F 9	" "	50.9	5.9	1.295	430	675	1100(51)	--
Cellulube 220 (Shell D.F.R.)	Phosphate Ester	43.6	6.9	1.145	455	665	1078(5)	--
Pydraul 150 (Monsanto)	" "	38.5	7.9	1.175	380	470	975(51)	--
Skydrol	" "	--	--	--	360	420	>1300(51)	--
			Mono- and Dibasic Acid Esters					
Plexol 201	Di 2-hexyl Sebacate	12.7	3.31	0.912	420	450	--	--
Plexol 244	Di-isooctyl Adipate	9.64	2.77	0.926	400	445	712(12)	--
Plexol 273	Di-isodecyl Adipate	14.5	3.56	0.920	425	460	--	--
Plexol 79	Polyester	1,250	108	1.023	540	620	--	--
MIL-L-7808 (O-60-18, Esso 4040)	Sebacate-adipate Diester	12.1	3.1	--	437	460	728, 486(7)	490(24)
MIL-L-7809 (H-1026)	Di-2-ethylhexyl Sebacate	12.58	3.3	--	--	--	755(50)	575(15)
MIL-L-9236 (O-60-7, YF-6538)	Trimethylol Propane Ester	15.1	3.6	--	430	475	730, 471(7)	~650(24)
MIL-L-9236 (O-60-27)	" " "	24.8	3.65	--	435	485	--	--
MIL-L-9236 (O-60-23)	" " "	15.99	3.62	--	470	525	--	--
MIL-L-9236 (O-61-87)	" " "	15.78	3.59	--	490	535	--	--
MIL-L-23699	" " "	16	3.2	0.97	425	510	>800(51)	~650(24)
MLO-54-581 (Texaco, TL-3456)	Diester	--	--	--	435	475	734(2)	--
YF 6538 (Hay.Benpett)	Trimethylol Propane Ester	--	--	~0.97	--	--	705, 507(50)	--
PAO (Esso 4275)	Polyester	--	8.96	0.951	510	--	711, 500(50)	--
MLO-60-50	Trimethylol Propane Ester	--	--	--	--	--	--	748(30)
Trimethylolpropane Tri-pelargonate	" " "	--	--	--	--	--	--	606(26)
			Silanes					
MLO-54 408C	Tetra Dodecyl Silane	34.58	6.37	--	535	625	775(17)	658(15)
MLO-56-280	Diphenyl di-n-dodecyl Silane	37.2	6.2	-	330	380	690(17)	>680(15)
MLO-56-578	Octadecyl trioctyl Silane	27.5	5.76	--	520	590	790(17)	--

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Table 2 (Cont)

Fluid	Chemical Class or Compound	Viscosity, cs 100°F	Viscosity, cs 210°F	Specific Gravity (Water=1)	Flash Point °F	Fire Point °F	Autoignition[1] Temperature °F	Decomposition Temperature °F
			Silanes (Cont)					
MLO-58-582	Octadecyl tridecyl Silane	33.9	6.8	--	545	595	750(17)	--
MLO-58-610	Undecyl tridecyl Silane	26.4	5.6	--	535	575	750(17)	--
MLO-58-611	Didodecyl dioctyl Silane	23.1	5.0	--	520	555	750(17)	--
MLO-57-9	Tetra undecyl Silane	29.26	6.11	--	545	600	760(17)	--
			Silicates and Siliconate					
Tetra (2 ethylhexyl)Silicate	Ethyl hexyl Silicate	--	--	--	--	--	--	638(28)
Oronite B.F 1	(2-ethylhexyl) Silicate	--	--	--	--	--	~520(12)	--
Oronite 6200	Silicate Ester	31.75	11.14	--	385	440	716(2)	--
Oronite 8515	" "	24.3	8.11	--	390	450	710(30)	--
MLO-56-645	85% Oronite 8 15% Plasnol	--	--	--	340	435	716(2)	--
MLO-56-560 (Monsanto OS-45)	Silicate Ester	--	--	--	325	430	703(2)	--
MLO 54-956 (Wellingshead, 72073C)	" "	--	--	--	315	440	716(2)	--
Versilube F-50	Silicone	52	16	1.045	550	640	900(51)	>600(51)
Versilube F-44	"	55	17	1.043	550	640	900(51)	>600(51)
Dow Corning 190	Polymethyl Siloxane	22.6	--	--	240	--	860(38)	--
Dow Corning 400	Polymethyl Siloxane	10.9	--	--	255	280	670(38)	--
Dow Corning 500	Polyethyl Siloxane	44.9	--	--	470	--	900(38)	--
Dow Corning 550	Silicone	65 to 87	--	1.065	600	--	--	340(28)
Dow Corning 700	Poly (methyl, phenyl) Siloxane	2.8	--	--	305	325	940(38)	--
Dow Corning 710	Methyl Phenyl Silicone	220	--	1.112	320	--	--	388(15)
MLO-59-98	50% Methyl Phenyl Silicone (DC 550) plus 50% DOP Adipate Tetraesponate	61.8	13.5	--	--	--	--	625(30)
			Halogenated Silicones and Hydrocarbons					
MLO-53-446 (GE 81406)	Chlorinated Silicone	--	--	--	580	710	786(2)	516(15)
MLO-59-387 (GE F-50)	Chlorophenyl Methyl Silicone	--	--	--	--	--	--	630(30)
Fluorolube F-8	Polytrifluorochloroethylene	5	--	1.86	--	--	~1205(12)	>613(51)
Pydraul A-290	Chlorinated Hydrocarbon	49.8	5.8	1.42	350	680	1200(51)	--
Aroclor-1248	Tetrachlorodiphenyl	45.0	3.2	1.41	380	None	~1185(12)	--
Aroclor-1242	Trichlorodiphenyl	17.7	--	--	350	633	1230(38)	--
Aroclor-1254	Chlorinated Hydrocarbon	--	--	--	--	--	~1085(12)	--

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Table 2 (Cont)

Fluid	Chemical Class or Compound	Viscosity, cs 100°F	Viscosity, cs 210°F	Specific Gravity (Water=1)	Flash Point °F	Fire Point °F	Autoignition[1/] Temperature °F	Decomposition Temperature °F
			Aromatic Ethers					
OS-124 (Monsanto, 5P4E)	5 Ring Polyphenyl Ether	363	13.1	1.20	550	660	1112(50)	≥833(30)
MCS-293 (Monsanto)	Aromatic Ether	25.2	4.13	1.19	428	518	914(50)	675
MLO-59-69[2] (Monsanto)	Bis (phenoxyphenoxy) Benzene	--	--	--	--	--	--	942(30)
mm-4P4E	Bis(m-phenoxyphenyl) Ether	60.9	5.98	--	465	--	1095(17)	~833(17)
pp-4P4E	Bis(p-phenoxyphenyl) Ether	2.83(300°F)	1.51(400°F)	--	516	585	1040(17)	~1335(15)
mmm 5P4E	m-Bis(m-phenoxyphenoxy) Benzene	332	12.7	--	540	680	1050(17)	870(17)
5P4E	Bis(phenoxyphenoxy) Benzene	380	13.6	--	560	660	1130, 1030(7)	810(25)
ppp-6P5E	Bis [p-(p-phenoxyphenoxy)phenyl] Ether	4.20(400°F)	1.55(600°F)	--	635	--	1030(17)	773(15)
			Phosphonitriles					
MLO-63-24	Hexaphenyltriphosphonitrile	--	--	--	---	--		910(30)
MLO-63-25	Phenoxy base Triphosphonitrile	--	--	--	--	--	--	905(30)
E488 (Ollo Mathieson)	Tetrameric Octylfluoroamyl Phosphonitrilate	--	--	--	--	--	900(19)	--
			Miscellaneous Oils					
Lard oil		--	--	<1	395	--	833(47)	--
Linseed oil		--	--	0.95	435	535	820(47)	--
Lube oil, cylinder		--	--	<1	--	535	783(47)	--
" " , light machine		--	--	<1	318	370	--	--
" " , spindle		--	--	<1	160	200	--	--
Neatsfoot oil		--	--	0.927	435	--	838(47)	--
Mineral seal oil		--	--	--	170	255	--	--
Olive oil		--	--	0.91	437	--	836(47)	--
Palm oil		--	--	0.92	421	--	650(47)	--
Pine oil		--	--	0.86	172	175	--	--
Rapeseed oil		--	--	0.915	325	550	836(47)	--
Sperm oil		--	--	0.88-1.1	286	--	648(47)	--
Soybean oil		--	--	0.925	540	--	833(47)	--
Tung oil		--	--	0.94	552	--	855(47)	--
Turkey-red oil		--	--	--	476	--	833(47)	--
S A E No. 10 lube oil		--	--	--	340	380	720(20)	--
S A E No. 60 lube oil		--	--	--	480	620	770(20)	--

1/ Autoignition and decomposition temperature data from references cited in parentheses. Viscosity, specific gravity, flash point, and fire point data mainly from vendor's literature.

2/ Ignition evidenced by visible flame except for underlined values where sudden pressure rise was used. Bureau of Mines data (Refs 2, 4, 5, 7, and 30) were obtained using reaction vessels ≥200 cc. Values listed for other references were determined in reaction vessels ≤125 cc.

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exercised through companies which insure against fire, utilities which supply electrical power, and building codes.

3. Extent of Capacitor Use

Almost all industrial capacitors contain PCBs. In 1968 95 percent of the U. S. production of capacitor liquids (2.46 million gallons) were PCBs (9). Two important types of capacitors are phase correction capacitors on power lines and ballast capacitors for fluorescent lighting. Non-ballast industrial capacitors produced in 1967 had a value of $112 million (10), and fluorescent lamp ballast capacitors produced that year numbered 21.7 million units with a value of $15.5 million (10). In 1970 there were 50.9 million ballast units produced with a value of $163 million (11). These ballast units are in extensive use inside buildings where non-flammability is important.

Phase correction capacitors are necessary on power circuits to correct for the inductive loading of much electrical power equipment. The amount of phase correction capacitance is ordinarily specified in kilovolt amperes of reactive current or kvars. Most power capacitors are rated at from 1/2 to 25 kvars so that the number of capacitors is very roughly the kvar value divided by 10 (12). As examples of the extent of power capacitor use, TVA has 2-1/4 million kvars (13), and a power company serving suburban New Jersey has 3.6 million kvars on their power lines with 1/2 million kvars on order (14). The value of these capacitors is roughly $5 per kvar (14). More than 20 million kvars of power capacitors were produced in 1970 (16).

The procurement lag for these capacitors is 1-1/2 to 3 years, and estimates for redesigning new systems range from 3 to 10 years, according to power company representatives to ASTM Committee D-27 (14,15). Extensive re-designing is anticipated if distribution capacitors were required to use presently available non-PCB liquids. Askarel capacitors have been developed to the point that failures are considered negligible (13, 15).

Several private sources reported extensive efforts to find replacements for PCB capacitor fluids, but none reported having a good substitute.

B. TRANSFORMERS

Most power transformers contain a liquid to electrically insulate and remove heat from the core and windings. The properties required of these liquids are:

1. Non-flammability (required for indoor use and desirable in remote location use).
2. High dielectric strength (prevents breakdown and allows transformer size reduction).
3. Low viscosity (promotes convective heat transfer).
4. High chemical stability (allows higher temperature operation and reduces degradation of the transformer).

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5. Compatibility with other materials
6. Inert decomposition products (reduces fire danger and damage to other materials following breakdown).
7. Low toxicity of the liquid and its decomposition products.
8. Low cost.

1. Advantages and Disadvantages of PCB in Transformers

The PCB transformer liquids, commonly called askarels, are mixtures of chlorinated biphenyls and chlorinated benzenes. Several standard mixtures for transformers (differing from the capacitor askarels) are specified by ASTM (17). These liquids are used to overcome the fire and explosion hazards present with transformer oils. For most power transformer applications where occasional explosions and fires do not endanger life and property, mineral oils are still preferred. However, for distribution transformers which are located near congested areas and in buildings, askarel and dry-type transformers are required by electrical codes (6). Other advantages of the askarels include: 1. their superior chemical stability, which eliminates the sludge formation common in mineral oils, 2. a high dielectric strength, which reduces electrical failures, and 3. suitable viscosity.

The disadvantage of the transformer askarels include: 1. a poorer resistance to impulse voltages and production of highly corrosive HCl during arcing, 2. a tendency to damage common insulating solids inside the transformer, 3. probable toxicity, and 4. higher cost (about $1.80 per gallon compared to $.25 per gallon for mineral oil (15, 18).

2. Replaceability of PCB in Transformers

Askarel transformers cost about 1.3 times as much as oil transformers, and dry types cost about 1.5 times as much as oil transformers. Thus most users prefer to use the oil type where possible. This preference for oil transformers accounts for the fact that 96 percent of transformer liquids in use in 1968 were mineral oil (9). However, fire underwriters will not accept the use of oils, silicones, and other flammable liquids for indoor transformers. Dry-type transformers can be used indoors, but are generally larger in size, require more copper and iron, and are somewhat more expensive, as shown above. Dry-type transformers could possibly replace askarel transformers in many cases.

No currently available liquid which will replace askarels in existing transformers is known. Possibly, non-flammable fluorocarbons could be developed as a suitable fluid, similar in important properties to the askarels. Fluorocarbons are currently in use as convective and evaporative dielectric coolants. One main disadvantage of the fluorocarbons is their high volatility and high cost (about 40 times the cost of oil and 6 times the cost of askarels (18)).

3. Extent of Transformer Use

In 1967, 1.7 million liquid-immersed distribution transformers of 500 kva and smaller, valued at $350 million, were produced (10). These include askarel-filled transformers placed under streets to serve 1 - 4 city buildings. These transformers can fail and cause fire damage if filled with a

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flammable liquid. An annual report on such failures is compiled by the Edison Electric Institute (19).

II. INDUSTRIAL FLUIDS FOR HYDRAULIC, GAS TURBINE, AND VACUUM PUMP USES

A. HYDRAULIC

Hydraulic fluids are liquids used as force transmitters (20, 21). The characteristics of a good hydraulic fluid are (20):

1. High lubricity (lowers heating and increases lifetime of moving components).
2. Stability (increases lifetime of use).
3. Appropriate viscosity and high viscosity index (24).
4. Low pour point (necessary for material to flow at low temperatures (25).
5. Compatibility (prevents interactions with other components, for example, rubber seals).
6. Good heat transfer (reduces local heating and large temperature gradients).
7. High bulk-modulus (important for extreme pressure applications).
8. Low volatility (necessary to prevent malfunctioning due to "vapor lock").
9. Low foaming.
10. Low thermal expansion. Aside from the implication of a more constant volume over a wide temperature range, a low thermal expansion implies a high viscosity index and the constancy of certain other properties with respect to temperature.
11. Good demulsibility.
12. Inhibitor (necessary to prevent oxidation of metals or rusting).
13. Good fire resistance (very important in high temperature environments).
14. Low density (desirable in transportation, particularly airborne, applications).
15. Good dielectric properties (reduces arcing or short circuiting should the fluids come in direct contact with electrical components).
16. Non-toxicity (reduces the danger to human beings from rupture of hydraulic equipment or improper disposal and to maintenance personnel during transfer of these fluids).

Since most commercial hydraulic fluid mixtures are proprietary, it is difficult to obtain information with respect to their composition. The results from inquiries with respect to PCB content have been somewhat contradictory. No definite knowledge is available that PCBs are present in commercial hydraulic fluids. Since composition specifications of these fluids are usually not available to the public, PCB content should be established by chemical analysis.

PCBs are useful in hydraulic fluids as lubricating additives in extreme pressure applications (26) and as pour point depressants. Although it is true that the pour point of oils may be lowered by extensive dewaxing, the use of additives is much cheaper. There are other inexpensive additives which are often used for these applications and which appear to be adequate. For

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example, TCP (tricresyl phosphate) is chemically stable as an additive in lubricants, and, although quite toxic, it is more biodegradable than the PCBs.

An important requirement for many applications of hydraulic fluids is good heat and fire resistance (27). Table 2 (28) gives the ignition characteristics for a large number of lubricants; however, in view of the propriety stated earlier, there is no detailed specification of the compositions of those fluids which are given the brand names. PCBs have excellent fire resistance characteristics. The flash and fire points given in the literature for the pentachlorobiphenyls are attributed to the burning of residual contaminants (29). At very high temperatures, however, PCBs with higher chlorine content may emit phosgene (a very toxic gas) in the presence of oxygen. (No evidence is available that high chlorine content PCBs are being used here).

Aircraft hydraulic fluids are an example of an application where excellent heat and fire resistance are necessary in view of moderately high operating temperatures and frequent accidents involving ruptured hydraulic components in the proximity of hot metallic surfaces. Also the fiberglas acoustic blankets in the jet engines become soaked with leaking hydraulic fluid within as little as one year of use (30). Fire resistance in phosphate ester type hydraulic fluids has been related to PCB content (31). Phosphate ester hydraulic fluids have been used extensively for commercial aircraft (32). According to one manufacturer, no PCBs are currently being incorporated in these fluids. PCBs have been assumed to be useful as "smuffers" in that they tend to extinguish a fire supported by other constituents.

The market value of used phosphate ester type hydraulic fluids is sufficiently high that they are being recycled (33). The recycled products are said to satisfy the same specifications as the uncycled fluids.

Considerable research is being done in connection with fire resistant hydraulic fluids for military aircraft. Some of the hydraulic fluids being tested do not contain PCB additives, but do contain TCP. It is possible that under appropriate processing, PCBs may be replaced by TCP and perhaps certain other additives to obtain satisfactory lubrication.

In naval applications current research includes development of water based hydraulic fluids (34), which would not contain PCBs. The boiling points of these fluids are too low to permit their use in aircraft.

It is possible that PCBs are also used in phosphate ester and other halogenated hydraulic fluids for industrial applications at high temperatures. The requirements here are similar to, but not as stringent as, those for aircraft hydraulic systems.

B. GAS TURBINES

The characteristics of a good gas turbine lubricant are similar to those of hydraulic fluids except for the additional requirement of lubricity at high rates of shear (35). Particular emphasis is placed on heat resistance, high

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viscosity index, low pour point, and oxidation and foaming resistance. Sample U. S. and U. K. military specifications are given in Table 3 (36). Usually, dibasic acid esters containing appropriate additives meet the above requirements. In the case of the turboprops, the same lubricant is usually used for both the turbine and prop-drive gear.

PCBs would seem to be useful as additives in gas turbine lubricants, but there is no evidence that PCBs are currently used for this purpose. Research along these lines has been done, and there is some indication that some PCBs have on occasion been added to gas turbine lubricants. The objection to PCBs and other chlorinated hydrocarbons is that they tend to be corrosive at the high temperatures reached in gas turbines. This corrosion is accelerated by decomposition of the PCBs and the formation of hydrochloric acid at high temperatures. The corrosiveness of PCBs is a major deterrent against their use in these lubricants. TCP also has the desirable property of reacting with metallic surfaces at high temperatures to form a protective coating.

Jet engines are run for approximately 18,000 hours (37) between overhauls. The lubricants are not usually changed during this period; however, the appropriate "oil level" is maintained at frequent intervals. Immediately before engine overhaul the lubricant is drained and discarded. Unlike the situation with respect to hydraulic fluids used in commercial aircraft, there appears to be no general recycling facility for gas turbine lubricants (37). As a result of their increase in acidity and viscosity during use, recycling of gas turbine fluids would demand expensive redistillation and reblending.

C. VACUUM PUMP APPLICATIONS (22, 23)

Both mechanical and diffusion pump applications require fluids of one highly fractionated component. Accordingly, additives generally are not used. However, PCBs are used in pure form as a diffusion pump oil in commercial applications.

The characteristics (38) of a good diffusion pump fluid are:

1. Relatively high vapor pressure at operating temperatures.
2. Low vapor pressure at room and lower temperatures. (The vapor pressure sets a lower limit on the ultimate vacuum).
3. Heat resistance (prevents cracking or molecular degradation at operating temperatures).
4. A low vapor pressure range and freedom from contaminants such as dissolved gases and liquids with higher vapor pressures. (This requirement often implies the necessity of a narrow fraction).
5. Oxidation resistance (important because air may enter a diffusion pump during operation either accidentally or through slow leakage).
6. Nonhygroscopic (absorbed water increases pump maintenance and may contaminate the vacuum system).
7. Compatibility (must be compatible with pump and vacuum system components).
8. Stability in the presence of the vapor being pumped.

Some of the pertinent properties of many diffusion pump fluids are given in Table 4 (39). The stability, oxidation resistance, appropriate vapor pressures, and, in particular, the relatively low cost of PCBs make them a desirable choice for many industrial applications. Although the ultimate vacuum using

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Table 3

High-Temperature Lubricant Specifications

	MIL-L-9236 B	MIL-L-27502	DEF(AS) 5227
Viscosity, cs at 500°F	–	1.0 min	–
400°F	1.0 min	–	2.0 min
210°F	–	Report	8.5 max
100°F	Report	Report	–
-20°F	–	13,000 max	–
-40°F	–	–	13,000 max
Viscosity stability test temp	-65°F	-30°F	-65°F
Vis change in 3 hr	6% max	6% max	–
Vis after 72 hr, cs	11,000 max	13,000 max	–
Vis after 72 hr, cs	24,000 max	17,000 max	–
Vis at -40°F after 12 hr	–	–	Report
Viscosity at 210°F	–	–	7.25 KV/210°F
Flash, °F	-75 max	-40 min	–
Fire point, °F	425 min	500 min	500 min
Spontaneous ignition temp, °F	750 min	Report	752 min
Vapor pressure at 500°F, mm Hg	–	5.0 max	–
Evaporation loss test temp	400°F	500°F	392°F
% Loss 6-1/2 hr at 29.9" Hg	15 max	10 max	Report
% Loss 6-1/2 hr at 5.5" Hg	–	Report	–
Specific heat, BTU/lb/°F at 100°F	–	0.35 min	–
Specific heat, BTU/lb/°F at 500°F	–	0.45 min	–
Rubber swell, 72 h	12-25% at 400°F	12-25% at 500°F	15-25% at 350°F
Copper swell, 72 h	–	–	100-35-100 ml
Foaming sequence I - II, max vol	100-25-100 ml	100-25-100 ml	5-3-5
Foaming sequence I, max, min	5-3-5	5-3-5	100 min (6 sides)
Four-ball EP test, reference	50 min (6 sides)	100 min (6 sides)	Report (500°F)
Four-ball wear test, reference oil	Report (400°F)	Report (500°F)	100 min (392°F)
Corrosion and oxidation	Report (400°F)	Report (500°F)	(Ref. oil at 250°F)

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Table 4

Some Properties of Pumping Fluids

Fluid	Proprietary name	Chemical nature	Molecular weight	Specific gravity (room temp.)	Flash point (open °C)	Viscosity (centistokes) at 20°C	Approx pour point (or freezing point) °C	Approx boiling point at 1 torr °C	Estimated true vapour pressure (torr)
[illegible]	As under 'fluid'	Paraffinic hydrocarbons	414	0·872	218	69	−12	190	10⁻⁸ (20°C)
[illegible]	" "	" "	468	0·873	235	100	−12	220	5 × 10⁻⁹ (20°C)
[illegible] C	" "	" "	432					225	~10⁻⁸ (20°C)
[illegible] G	" "	" "	576	0·880	265	295	−9·5	255	4 × 10⁻⁹ (20°C)
[illegible] W	" "	" "	485	0·873	232	86	−12	210	2 × 10⁻⁷ (20°C)
[illegible] Id	" "	" "	380					165	5 × 10⁻⁴ (20°C)
[illegible] 23	" "	" "	258	0·91	191	147	−23	150	6·7 × 10⁻⁶ (20°C)
Di-n-butyl phthalate	—	$C_6H_4(COOC_4H_9)_2$	278	1·044	159	19	−71	302	1·3 × 10⁻⁶ (20°C)
Di-(2-ethylhexyl) phthalate	Octoil-S	$C_6H_4(COOC_8H_{17})_2$	391	0·983	196	75	−52	384	10⁻¹¹ (20°C)
Di-(2-ethylhexyl) sebacate	Octoil-S Narcoil-70 Viscoil 20	$C_8H_{16}(COOC_8H_{17})_2$	427	0·912	209	24	−36	215	10⁻⁹ (20°C)
Dinonyl phthalate	Narcoil-40 Viscoil-40	$C_6H_4(COOC_9H_{19})_2$	419	0·973	215			215	10⁻⁷ (20°C)
Tricresyl phosphate	—	$(CH_3C_6H_4)_3PO_4$	368	1·17	249	105		219	5 × 10⁻⁶ (25°C)
Trixylenyl phosphate	—	$[(CH_3)_2C_6H_3]_3PO_4$	410	1·14	243	160		245	
Glycerol	—	$(CH_2OH)_2CH(OH)$	92	1·26		1160		123	5·6 × 10⁻⁴ (15°C)
Mixed chlorinated diphenyls	Aroclor 1248 Convaclor 8 Clophen A-40	Approx. $C_{12}H_5Cl_5$	292	1·45	193	400	−7	137	1·5 × 10⁻⁴ (20°C)
Mixed chlorinated diphenyls	Aroclor 1254 Edwards Booster fluid A Narcoil-10 Viscoil-10 Convaclor-12 Clophen A-50	Approx. $C_{12}H_6Cl_4$	326	1·54	none	~6000	10	150	8 × 10⁻⁹ (20°C)
Silicone DC or MS 702	As under 'fluid'	} Methyl polysiloxanes $(CH_3)_3SiO[(CH_3)_2SiO]_x[(CH_3)_2]Si$	530	1·071	194	35	−40	173	
Silicone DC 704	" "		570	1·089	227	40	−36	206	
Silicone DC or MS 704	" "	Tetraphenyl tetramethyl trisiloxane	554	1·066	216	47	−38	273	10⁻⁸ (20°C)
Silicone DC or MS 705	" "	Pentaphenyl trimethyl trisiloxane	546	1·095	243	170 (25°C)	−15	256	5 × 10⁻¹⁰ (25°C)
Convalex 10 or YRT fluid E	" "	Mixed 5-ring polyphenyl ethers	447	1·198	288	2500 (25°C)	4·5	285	1·3 × 10⁻⁸ (25°C)
Mercury	—	Hg	200·6	13·6	—	1·15	−39·2	127	1·1 × 10⁻³ (20°C)

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PCBs is limited by their relatively high vapor pressure at low temperatures, their use at high boiler pressures makes possible operation with poor forepump vacuums. Hence they are useful as booster pump fluids. In this respect the vapor pressure-temperature properties are closely matched by amyl phthalate.

Except for certain applications where alternative liquids may be incompatible with the vapors being pumped, the advantage of using PCBs diffusion pump oils appears to be mostly an economic one. Other fluids may often be preferable though considerable more costly. TCP is used as a commercial diffusion pump fluid and is also inexpensive. Its vapor pressure (39) is lower than that of the PCBs making it less desirable in booster pumps, but in many applications TCP may be a suitable replacement. PCB diffusion pump oils can be decomposed after use by incineration. This service is available mainly for disposal of Askarel transformer fluids containg PCBs.

III. HEAT TRANSFER APPLICATIONS

Heat transfer fluids are used to absorb thermal energy from a source and by cooling or changing phase, deliver heat to a place of utilization. The reverse process, using a fluid as a coolant, requires similar fluid properties. Summaries of heat transfer fluids and applications are available (41, 42). The properties required of heat transfer fluids are (41) as follows:

1. Suitable density and expansion coefficient.
2. High heat capacity or heat content (increases amount of heat transferred during cooling or phase change).
3. High heat conductivity (increases heat transfer).
4. Low viscosity (necessary for fluid flow through system).
5. Physical stability (will not have unpredictable phase or property changes).
6. Chemical stability (will not degrade, oxidize, etc.).
7. Radiolytic stability (will not suffer damage from radiation if present).
8. Low cost.
9. Low surface tension (reduces fluid flow and heat transfer between fluid and surroundings).
10. Low corrosion (reduces damage to metal parts of the system).
11. Low flammability (reduces fire and explosion danger).
12. Low toxicity.

Electrical properties, refractive index, appearance and odor may be considered for some applications.

A. ADVANTAGES AND DISADVANTAGES OF PCBs AS HEAT TRANSFER FLUIDS

The main advantage of the PCBs as heat transfer fluids is their fire resistance. This property if of primary importance where there is a possibility that fire from high temperature leakage could endanger life and property. The other advantages of PCBs are low pour points and viscosities and good thermal stability up to 600°F. PCBs are relatively inert and have excellent electrical properties, which makes them valuable for cooling transformers. The cost is relatively low. Disadvantages of PCBs include possible

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toxicity, a tendency to decompose to form highly corrosive HCl, a lower decomposition temperature than some alternate liquids (43) and relatively poor radiation resistance (44).

B. REPLACEABILITY OF PCBs AS HEAT TRANSFER FLUIDS

Increased risk from fire and explosion is a major disadvantage with most PCB replacement fluids. Other non-flammable fluids are: 1. fluorocarbons, which have low toxicity, high thermal stability, and in spite of high cost are used as convective or evaporative coolants (1), 2. water, which is quite corrosive, has a high temperature limit of 374°C and requires extremely expensive high pressure systems for its use above the atmospheric boiling temperatures and 3. molten salts and metals which, because of their resistance to radiation damage, are useful in reactor applications.

Several liquids are more stable at high temperatures than the PCBs. Table 5 (42) shows the decomposition point range of liquids in a variety of chemical classes. Few of these liquids are non-flammable, however, as can be seen from Table 2. The phosphate esters, silanes, and aromatic ethers have high fire points (around 600°F), but they are flammable and it is not clear how high the fire point must be for a fluid to be safe in a high temperature system, especially in the event of leakage into a furnace. The details of specific heat transfer applications are necessary to evaluate the suitability of PCB replacement fluids.

IV. PLASTICIZER AND MISCELLANEOUS USES *

A plasticizer is a material incorporated in a plastic to increase its workability and flexibility (45,46). The addition of a plasticizer may lower the melt viscosity and flow temperature (increasing the ease with which the plastic can be made to flow),or lower the elastic modulus (making the plastic softer) (46). Plasticizers are generally non-volatile liquids or low-melting solids. A major requirement of a plasticizer is that it have high compatibility* (mixes well to form a homogenous composition with useful properties) (42) with the material being plasticized. Figures are given in Table 6 for the compatibility of some common plasticizers with some common synthetic thermosetting or thermoplastic resins (45). Other properties which are important when considering plasticizers are specific gravity, refractive index, color, odor, moisture sensitivity, vapor pressure (volatility), boiling range, stability (to light and heat) toxicity and cost (47). Of course, the properties of the final plasticized material are of prime importance. Certain plasticizers provide formulations with specific properties such as:

1. phthalate esters - general purpose.
2. adipates and azelates - low temperature flexibility.
3. highly aromatic esters - fast processing, strain and extraction resistance.
4. epoxies - heat stabilization during processing.
5. phosphate esters and PCBs - fire retardant materials.

* The information in this section about specific uses was obtained from Chemical Abstracts (1928-1969) and patent claims. The Task Force has no knowledge whether or not specific applications are in current production or use.
* Note that the term "compatibility", used here, has a meaning very different from its use earlier in this appendix. In the earlier case, compatibility meant that two materials could coexist without either being affected by the other. The present meaning is quite the opposite.

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Table 5 (42)

Decomposition Point Range (°F)	Chemical Class
Over 800	Unsubstituted Polyaromatic compounds
	Unsubstituted Polyphenyl ethers
	Unsubstituted Aromatic amines
	Unsubstituted Aryl silicates
	Unsubstituted Aryl silanes
	Unsubstituted Aryl borates
700-800	Lower alkylaromatic ethers
	Aromatic phosphates
	Aromatic sulfones
	Aromatic ketones
	Silicones
	Halo-substituted aromatic ethers
	Halo-substituted polyphenyls (including PCB's)
600-700	Alkyl borates
	Alkyl silicates
	Higher alkylaromatic ethers
	Highly refined mineral oils
	Fluorinated esters
	Neopentylpolyol esters
500-600	Sebacate esters
	Methyl aryl esters
	Aliphatic tertiary amides

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Table 6. Approximate Maximum Compatibility, phr[+], of Plasticizers with Various Resins

	Phthalates						Adipates		Azelates			Phthalic glycol esters			Polymeric				Epoxidized	Sebacates		Miscellaneous		
	Dimethyl	Dibutyl	Di-2-ethylhexyl	Dioctyl	Diisooctyl	Butyl benzyl	Di-2-ethylhexyl	Dinonyl	Triphenyl	Tricresyl	2-ethylhexyl diphenyl	Triethylene bis	Tributoxy ethyl	Methyl phthalyl ethyl glycolate	Butyl phthalyl butyl glycolate	Castor oil	Sebacic polymer 400	Sebacic polymer 4000	Paraplex G-25	Paraplex G-30	Paraplex G-54	Paraplex G-62	Acid 2-ethylhexyl ester of tetrahydrophthalic anhydride	Sulfonamide, o,p-Toluene, mixed	Castor oil, hydrogenated	Ethyl cellulose
polystyrene (medium)	100	100	100	100	30	100	100	50	50	100	100	10	60	50	100	100	100	100	100	100	100	100	40	1	30	60	60
polystyrene (high)	100	100	1	1	50	100	1	1	50	90	50	1	50	100	1	75	100	50	0	0	0	1	100	50	50	1	1
polystyrene (low mol wt)	50	75	50	10	20	75	15	10	20	75	75		50	75	1	10	25						50	20	50	20	
polystyrene	100	100	50	100	20	100	100	25	20	15	50		100	20	20	1	50						20	10	100	10	
ethyl cellulose	100	100	100	100	50	100	100	100	20	70	100	100	50	75	75	10	30	1	1	<1	100	60	75	75	100	1	1
cellulose acetate	60	100	100	100	50	100	25	25	75	100	100	100	100	100	100	100	100	100	100	100	100	100	50	50	100	10	1
cellulose acetate	80	2	1	1	1	10	1	1	25	15	20	<1	10	100	50	1	1	1	1	1	1	1	90	80	1	1	1
cellulose acetate butyrate	100	100	40	50	20	100	25	50	50	80	80	<25	25	100	50	100	100	1	1	100	1	1	80	25	50	20	
chlorinated rubber	25	100	30	100	20	80	100	100	50	100	100		100	100	50	50	50		100	100	100		50	2	100	100	
high styrene-butadiene copolymer	20	50	50	50	20	50	30	20	20	50	50		50	50	50	15	25						25	25	50	25	
petroleum sulfonates	30	20	1	1	1	30	1	1	10	30	25		10	30	40	1	1						50	60	1	1	
shellac	5	1	1	1	1	1	1	1	1	1	1		1	10	1	1	1						40	60	1	1	
acrylic resins	100	70	25	25	20	75	10	1	25	25	100	100	25	60	50	1	1	1					25	25	30	20	2
polyamides	1	25	25	20	10	25	25	25	10	25	20		15	1	1	1	1						80	25	25	1	
polyesters	5	20	20	15	20	20	1	1	10	20	20		20	5	20	5	10						40	5	25	1	
epoxy resins	5	25	1	1	10	25	1	1	10	25	25		25	25	25	1	1						50	50	50	1	
phenolic resins	25	50	50	25	25	50	25	25	50	50	50		50	50	50	15	25						50	50	25	25	
alkyd resins	25	50	25	25	25	50	50	25	50	70	70		50	50	50	20	25						25	25	25	25	
melamine-formaldehyde resins	1	1	1	1	1	1	1	1	1	1	1		1	1	1	1	1						50	80	1	1	
polyamides	25	25	25	25	10	25	15	15	50	25	25		25	25	25	10	25						20	10	25	25	
nitrile and neoprene rubber	100	100	50	25	50	100	50	25	50	50	60		50	50	50	25	50		45				50	50	50	50	

* Trademark Monsanto Co.
* Trademark Union Carbide Corp.
* Trademark Rohm and Haas Co.

[+] parts per hundred

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PCBs are attractive as plasticizers because of their high compatability factor. They have been made with a wide range of properties, as shown in Table 7 (48). The PCBs are permanently thermoplastic, chemically stable, non-oxidizing, non-corrosive, have excellent solvating powers, and are fire resistant (48, 49). They are not normally attacked by acids, alkalines, or water. They are insoluble in water, glycerol, and glycols, and are soluble (at the lower chlorine contents) in organic solvents (48).

The main disadvantages of PCBs are their possible toxicity, and relatively high cost.

A. ADHESIVES

An adhesive is a substance capable of holding materials together by surface attachment (51, 52). The major types of plasticized resin adhesives are emulsion, hot-melt, delayed tack, solution, pressure-sensitive and adhesive primers and coatings. Almost every thermoplastic resin is used individually or in resin blends as a hot melt adhesive. This necessitates a wide range of plasticizers. Of special value are the solid plasticizers. They plasticize the resin while hot and while the bond is being formed, but solidify at lower temperatures to overcome the problem of excessive softness (53). Among those solid plasticizers used are: o,p-toluenesulfonamide, N-cyclohexyl-p-tolunesulfonamide, triphenyl phosphate, and diphenyl phthalates. The more resinous chlorinated polyphenyls would also be included in this category. Hot melt adhesive compositions based on phenolic resins are used in brake linings, clutch faces, and grinding wheels. Reactive plasticisers, such as the toluenesulfonamides, are employed because they improve the flow properties by reducing the viscosity of the phenolic resins (54). They help the resin wet the fillers and abrasives. Chlorinated polyphenyls and aryl phosphates (non-reactive plasticizers) also improve flow properties of phenolic resins prior to curing as well as imparting some flame proofing characteristics to the composition. PCBs have also been used in laminating adhesive formulations involving polyurethanes and polycarbonates (55-57) to prepare safety and acoustical glasses. The laminates have improved strength and resistance to delamination over a broad temperature range, and improved sound-absorption and energy dissipation properties.

Polyarylene sulfides, treated with chlorinated biphenyls, are employed to laminate ceramics and metals (58, 59). An ethylene-propylene copolymer blended with PCB has been used in a hot melt adhesive having improved toughness and resistance to oxidative and thermal degradation. It has excellent adhesion to polyethylene films (60). Similar adhesives, used to bond polyethylene to itself or other plastics, were prepared from styrene, alpha-methylstyrene or methylmethacrylate (61) Washable wall coverings and upholstering materials, made from films of polyvinyl chloride, are claimed to be improved by the addition of PCB to the adhesive formulation (62). PCBs can also be applied in the preparation of polyvinyl alcohol adhesive compositions which are used to manufacture envelopes (63), in self-adhering films (64), and in preparation of coatings of pressure-rupturable capsules for adhesive tape (65).

B. TEXTILE COATINGS

A textile coating for ironing board covers can be formed from a mixture of chlorinated biphenyl, cellulose acetobutyrate, and aluminum metal particles (66). PCBs also can be used as a de-lustering agent for rayons (67, 68). Poly-alpha-olefins, (i. e., polypropylene) films, when coated with a mixture of PCBs, UV

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Table 7. General Properties of Some Aroclors (PCB)

Material	Form and color	Specific gravity	Distillation range,[a] °C (corr)	Flash point,[b] °C	Fire point,[c] °C	Pour point,[d] °C	Softening point,[e] °C	n_D^{25}	Viscosity/sec 37.8°C	Viscosity/sec 98.9°C
Aroclor 1221[f]	colorless, mobile oil	1.182-1.192 (25/15.5°C)	275-320	111-130	176	crystallize at 1°C		1.617-1.618	28-31	30-31
Aroclor 1232	almost colorless, mobile oil	1.270-1.280 (25/15.5°C)	290-325	152-171	218	−35.5		1.620-1.627	44-51	31-32
Aroclor 1242	almost colorless, mobile oil	1.381-1.392 (25/15.5°C)	325-366	176-190	none	−19		1.627-1.629	82-91	34-35
Aroclor 1248	yellow-green tinted, mobile oil	1.405-1.415 (65/15.5°C)	340-375	196-196	none	−7		1.630-1.641	153-210	36-37
Aroclor 1254	light yellow, viscous oil	1.495-1.505 (65/15.5°C)	365-390	none	none	10		1.639-1.641	1500-2500	41-45
Aroclor 1260	light yellow, soft, sticky, resin	1.555-1.566 (90/15.5°C)	385-420	none	none	31		1.647-1.649		72-78
Aroclor 1262	light yellow, sticky, clear resin	1.572-1.582 (90/15.5°C)	395-425	none	none	35-39		1.6501-1.6517		86-100
Aroclor 1268	white to off white powder	1.808-1.811 (25/25°C)	435-450	none	none		150-170[h]			
Aroclor 1270	white crystalline powder	1.911-1.960 (25/25°C)	450-460	none	none		240-300[h]			
Aroclor 4465	transparent, yellow, brittle resin	1.670 (25/25°C)	290-350 (4 mm Hg)	none	none		60-66	1.664-1.667		90-120 (130°C, 300-400
Aroclor 5442	yellow, transparent, sticky resin	1.470 (25/25°C)	215-300 (4 mm Hg)	247	>350	48	46-52			
Aroclor 5460	clear, yellow-to-amber, brittle resin	1.670 (25/25°C)	290-335 (5 mm Hg)	none	none		98-105.5	1.660-1.665		
Aroclor 7665	black, opaque, brittle resin	1.734 (25/25°C)		none	none		60-72			

[a] ASTM D-86 (modified). [b] Cleveland open cup. [c] Cleveland open cup, none indicates no fire point up to boiling temperature. [d] ASTM D-97. [e] ASTM E-28. [f] Saybolt Universal, ASTM D-88. [g] Last two digits indicate approximate chlorine content, i.e., Aroclor 1221 contains about 21% chlorine. [h] Hold point on soluble resin.

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light absorbers, and antioxidants show increased stabilization to oxidative degradation on exposure to sunlight and weathering (69, 70). Polyamide (nylon-type) yarns were found to be flame proofed when treated with PCB (71). Chlorinated biphenyls can also be used as ingredients in some sealing formulations employed to waterproof canvas (48).

C. SURFACE COATINGS

In paints and varnishes, the hard resinous PCBs impart increased hardness to films, and the softer resins give flexibility (48). The role of these materials is similar to the oil, except that they do not oxidize and lose flexibility on aging. In nitrocellulose lacquers, PCBs either alone or in combination with other plasticizers and resins impart increased weatherability, luster, adhesion, and decreased burning rates (48, 72).

Some comparison studies have been made recently on the effects of various plasticizers upon the overall properties of paints and varnishes made from acrylic latexes (73). Films plasticized with tricresyl phosphate (TCP) had better stability, tensile strength, and adhesion than did film plasticized with dibutyl phthalate or PCB (73). For varnishes prepared from polyvinyl chloride formulations, and plasticized with either di-butyl phthalate or PCB, the films plasticized with PCB had better overall properties with or without pigments (TiO_2) (74).

PCB and other plasticizers can be used in combination with poly (organosiloxanes) to prepare film casting solutions. These polymeric films could be employed in electrical coatings, insulating tapes, and protective lacquers (75-77).

Plastic vessels, i. e. bottles, manufactured from polyethylene, polyvinyl chloride, polyvinylidene chloride or similar resins coated with an epoxy lacquer (which contains PCB) make the vessels pliant, impervious, and resistant to aromas, acids, and alkalis (78).

Paints for atomic energy installations are needed for (a) contaminated areas, (b) tolerance to high energy radiation, and (c) to meet clean condition standards. Paints for (a) should be glossy and smooth and should not transmit contaminants. For this purpose, the vinyl polymers are preferred over epoxy lacquers. The best plasticizers for use in this area are claimed to be the PCBs (79). The extent, if any, of their use in this application is unknown.

The PCBs are usually compatible with epoxy resins, and they give good final hardness and impact resistance equal to the unmodified resin (80). They also aid in the acceptance by the resin of larger amounts of fillers. Epoxy resins in combination with PCB can be used as protective coatings for metals, i.e., encapsulating electrical capacitors (81), for ferrite magnet cores (82) (used in computers), for co-rosion resistant resistors (83), for pigmented metal coatings (84, 85) for winter camouflage coatings (86), and for pipes and blocks (87).

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D. SEALANTS

Sealing and caulking compositions include a wide range of compounds which can be used to seal joints or voids against water and water vapor, air and other gases, dust, sound, vermin, heat and cold (88). Specialized applications require resistance to certain chemicals or atmospheric environments. PCBs can be used as plasticizers in the formulation of putties from copolymers of ethylene-vinyl acetate or styrene (89). The products are non-harcening, and resistant to moisture and frost and show good weatherability A non-sticky, non-hardening putty was also prepared from polysulfide mixtures which employs PCB as the plasticizer. This putty gave good bonding to building materials and had good extrudability and shape retention (90). Elastic pavement or concrete sealing compositions, used for traffic markings, were prepared from coal-tar-polysulfide mixtures which are plasticized with PCB (91). A sealant, effective for concrete and asphalt applications, can be formulated from a mixture of polysulfide, chlorinated rubber, and polyisocyanate, and plasticized with PCB (92).

E. PRINTING

Chlorinated biphenyls have been employed as part of the formulations used to prepare pressure-sensitive record (93, 94) and colored copying papers (95, 96, 102, 103). They have been used to coat papers used in thermographic duplicating processes (97-101) as well as in xerographic transfer processes (104, 105). Solvent-free printing on polyolefin plastics can be accomplished by heating a mixture of low molecular weight material, chlorinated biphenyl or terpene resin, and suitable pigments and dyes. Durable prints can be made on the surface of the polyolefin at the time of their thermoplastic shaping (106). Printing plates, hard enough for high quality letterpress printing, and sufficiently flexible for use as flexographic plates, can be prepared from compositions containing a liquid resin such as epoxy, polyester, urethan, acrylic or vinyl with an excess of curing agent and PCB as the plasticizer (107). The extent, if any, of current usee of PCBs in printing application is unknown.

F. FIRE RETARDANT AND FLAME-PROOFING COMPOSITIONS

When PCBs are used as plasticizers, they impart a certain degree of non-flammability to the objects as described previously. However, for increased effectiveness in flame retardant applications, the PCBs can be admixed with various metal oxides. Some flame retardant compositions based upon these mixtures are: polyolefin yarns (108); organopolysiloxane sealants (109); thermoplastic poly (hydroxylethers) (110); fireproof panels made from starch which can be used for doors, floors, ceilings, and partitions (111); polyamides (112); and in fireproof fiberboards (113). Rigid polyurethane foams (114-116) and hardboard compositions (117), when treated only with PCBs do not show any significant increase in flame retardance.

G. MISCELLANEOUS APPLICATIONS

The wide range of chemical and physical properties exhibited by the PCBs (see Tables 5 and 7) make them desirable for an assortment of miscellaneous uses. Some of the more interesting and non-conventional uses are as follows:

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1. Catalyst carrier for polymerization of olefins(118).

2. Conversion of water-permeable soil to a non-permeable state. Soil is made non-permeable by applying to the soil a composition consisting of an ethoxylene-based resin, polyamide, camphor, and PCB as plasticizer. The composition has a density greater than water, and it hardens under water. It can be applied to river banks, where it flows down the bank, and after hardening, prevents penetration of water (soil erosion-retardant) (119).

3. Combined insecticide and bactericide formulations. The composition contains aldrin or dieldrin, naphthalene hydrocarbons, malathion, methoxychlor, lindane, chlordane, terpineol, and chlorinated biphenyl as active agents (120).

4. Inhibitors of microbial growth in enamel clay formulations (121).

5. Plastic sound insulating materials for railway cars (122).

6. Plastic (PVC) decorative articles which give the impression of internal scintillation (123).

7. Increasing the density of carbon plates by impregnation with PCB (124).

8. Graphite electrodes with low thermal expansion coefficients and high bending strengths (125).

9. Increasing the coke yield from coal pitch. The coke is very hard, dark, and brilliant (126).

10. As a metal quencher or tempering agent for steel, alloys, and glass (127, 128).

11. As an aid to fusion cutting of stacked metallic plates without adherence. The cutting is done with an electric arc or oxy-gas torch (129).

We find no evidence that PCBs are indispensable to a particular plasticizer or miscellaneous application. In most of the formulations and compositions cited, there were usually alternative plasticizers included in the citation (see Table 6) which did not appear to be detrimental to the application.

V. SUMMARY

The major value of the PCB liquids is that those with four or more substituted chlorines per molecule are non-flammable as are their decomposition products. Thus they can be used as fluids at temperatures up to 700°F without the danger of explosions and fire. The major disadvantage of the PCBs is their possible toxicity danger. The other comparable class of non-flammable fluids are the fluorocarbons which typically have a lower vapor pressure and lower boiling point than the chlorinated compounds.

PCBs are used in fluids (known as askarels) for electrically insulating and cooling transformers when the transformers are used in or near buildings. Mineral oils are the preferred fluids when fire does not create a hazard. Dry transformers can also be used but are larger and more expensive. Fluorocarbon liquids require a special transformer design. Fluorescent light ballast capacitors and phase correction capacitors utilize the high dielectric constant of the PCBs to effect significant reduction in capacitor size and cost. Few suitable fluids have a comparably high dielectric constant. Flammable fluids are not allowed by insurance companies and building codes in capacitors used in buildings. Replacement of PCBs in capacitors and

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transformers would require considerable time and money for reengineering, manufacture, and application of substitute equipment.

PCBs are useful in hydraulic systems where leakage onto hot metal surfaces could cause a dangerous fire. Hydraulic fluids can also be made with phosphate esters which are toxic and which will burn at high temperatures. Replacement of PCBs in some hydraulic systems could increase loss of life due to fire. Gas turbines require lubrication at high temperatures. PCBs can be used but tend to be corrosive. Phosphate ester lubricants seem better in this respect. Chemical stability is more important for high temperature lubricants than is non-flammability. PCB fluids are useful in diffusion booster pumps to produce moderately high vacuums with relatively poor fore vacuums. Non-flammability is not especially important for diffusion pump liquids, and with a few possible exceptions alternative liquids are available.

Flammable heat transfer fluids present a fire hazard if they leak into a furnace or onto hot surfaces. The use of PCBs can prevent this danger. In some cases water is a suitable substitute at moderately high temperatures. Other heat transfer fluids are commercially available and in use. Replacement of PCBs is satisfactory in some, but may be dangerous in other heat transfer uses.

The PCBs are good plasticizers for use with adhesives, textiles, surface coatings, sealants, and copy paper. In some cases the PCBs act as fire retardants. There are no particularly unique properties of PCBs for plasticizer uses, and equally effective alternatives are generally available (e.g. phosphate esters are often used as fire retardants). The extent of current use, if any, in such applications has not been determined.

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APPENDIX C

The Need For Continued Use of PCBs As Electrical Insulating Liquids

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APPENDIX C

The Need For Continued Use of PCBs As Electrical Insulating Liquids

I. HOW ARE PCBs USED BY THE ELECTRICAL INDUSTRY? (1)

The principal use of PCB fluid in the electrical industry is in transformers and capacitors (both large and small) as an insulator and coolant.

> Transformers are devices for converting electrical power from one voltage and current level to another, and the conducting parts of these devices must be separated from each other by a suitable insulating medium.
>
> Capacitors are devices for storing electrical energy through the physical separation of charged metal surfaces by an insulating medium.

Because of the nonflammability (Table 1) of Aroclors (the trade name of Monsanto), their vapors, and their arc-formed gaseous products, transformers filled with PCBs are relatively free of fire and explosion hazards and may be used in locations where failures of oil-insulated transformers would present a potential danger to life and property. In addition to improving the safety aspect of capacitors, Aroclors also have the advantages of reliability, long life, and small size.

Table 1

Underwriters' Laboratories Flammability Ratings

Fluid	Flammability Rating
Ether	100
Gasoline	90-100
Butyl Alcohol	60-70
Kerosene (100° F.P.)	30-40
Mineral Oil	10-20
Aroclor 1242 and MCS 1016	2-3

II. THE NEED FOR PCBs IN TRANSFORMERS

PCBs are used in transformers wherever fire protection is particularly important -- for about 5 percent of all transformers.

Most of these transformers are located inside public, commercial, or industrial buildings; on the roof tops of such buildings or in close proximity to such buildings, and require no special enclosures other than necessary to prevent accidental hazardous mechanical or electrical contact of persons with the equipment. See Table 2 for some liquid chlorinated biphenyls.

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TABLE 2

Composition of Different Liquid Chlorinated Biphenyls

Components given as % -	Monsanto Aroclors							
	1221	1232	MCS 1043	1242	MCS 1016	1248	1254	1260
Chlorine	21	32	32	42	42	48	54	60
Biphenyl	14.8		.04	.02	.02			
Mono-chlorobiphenyl	56.5		22.2	.72	.93			
Di-chlorobiphenyl	26.9	~ 55	74.4	15.6	19.4			
Tri-chlorobiphenyl	1.42		3.3	54.5	64.5			
Tet-a-chlorobiphenyl	.06			22.5	15.0	~ 55		
Penta-chlorobiphenyl				6.7*	.16*		60	
Hexa-chlorobiphenyl								70

*Includes higher than penta-chlorinated isomers.

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The amount of Arcclor used in various types of transformers ranges from 40 to 500 gallons (516 to 6,450 lbs.) with an average of about 235 gallons (3,032 lbs.). During 1968, the last complete "normal" year for the electrical industry, the total amount of PCBs used in transformers was approximately 1.3 million gallons (8.4 thousand tons).

The only present alternatives to Aroclor-insulated transformers are mineral oil-insulated transformers or dry-type transformers (either those open to the atmosphere or those that are gas-filled and sealed).

A. MINERAL OIL-INSULATED TRANSFORMERS

1. If one disregards safety considerations, there are no technical reasons why mineral oil-insulated transformers could not be directly substituted for PCB insulated transformers. The size of the unit would be unchanged; the weight and cost would be less.

2. But one cannot disregard safety considerations, which are often embodied in legal codes. Obviating the safety hazards involves serious economic and space constraints, that would occur either by the use of protective vaults, or use of insulated buses (with the transformer located outdoors). Either solution, if space is available, could cost $5,000--$50,000 per transformer.

B. DRY-TYPE TRANSFORMERS

In most locations, dry-type transformers (either those open to the atmosphere or those that are gas-filled and sealed) could not be directly substituted for PCB-insulated transformers. There are several restrictions to such a direct substitution:

1. The reliability of dry-type transformers is less than that of comparably rated liquid-insulated transformers. An Edison Electric Institute survey of failures in network transformer banks showed a 7 percent per year failure rate for dry-type units compared to 0.2 percent for liquid-insulated units.

2. Furthermore, liquid-insulated transformers have a much greater overload capability. Many liquid-insulated units can sustain a 100 percent overload for 8 hours and a 200 percent overload for 2 hours. These transformers are able to maintain continuity of electrical service during periods of temporary malfunction of related equipment.

3. Some dry-type transformers are larger by 10 to 30 percent than comparably rated liquid-insulated units, and most are expensive.

4. Dry-type transformers are noisier by 5-10 db than are liquid-insulated transformers.

5. Open dry-type transformers, which are cheaper than sealed dry-type transformers, cannot be used in certain corrosive or hazardous atmospheres, e.g., on furnaces or on electrostatic precipitators near hot stacks.

Clearly there is no substitute for PCB-filled transformers where fire protection is required.

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III. THE NEED FOR PCBs IN CAPACITORS

PCBs are used in more than 90 percent of the electric utility (large power) type and smaller industrial type capacitors made today. They are needed for safety, reliability and long life, and to achieve sizes compatible with equipment and installation requirements.

The principal types of PCB-impregnated capacitors and their applications are high voltage power capacitors used primarily for power factor correction in the distribution of electric power; low voltage power capacitors installed in industrial plants at the load (typically large motors); ballast capacitors to improve the efficiency of lighting systems; and small industrial capacitors for power factor improvement in such equipment as air conditioning units, pumps, fans, etc. Almost 80 million such capacitors are manufactured annually, most of them for first-time use.

Capacitors used in lighting and air conditioning applications contain 0.005 to 0.09 gallons of PCB per unit. The largest power capacitors contain about 6.7 gallons of askarel. The most popular size contains about 3.1 gallons. The National Electrical Code requires that any installation of capacitors in which any single unit contains more than 3 gallons of combustible liquid shall be in a vault like that required for transformers. During 1968, the last complete "normal" year for the electrical industry, the total amount of PCBs used in capacitors was approximately 14.4 thousand tons.

Possible alternatives to PCB-impregnated capacitors are capacitors impregnated with mineral oil, or certain other liquids.

A. MINERAL OIL

1. Size

The single most important property of a liquid to be used in a capacitor is its dielectric constant (the ratio of its ability to store electrostatic energy relative to air). The dielectric constant of the capacitor-grade PCB (Aroclor 1242) is 5.85 while that of mineral oil is 2.25. (See Table 3) Reverting to an oil-paper dielectric system would increase the average capacitor volumn(size) by approximately 600 percent the weight by 500 percent, and the cost by approximately 400 percent. At the present levels of demand for capacitor KVAR, there would be a shortage of electrical grade paper and a shortage of capacitor factory facilities further tending to increase the cost to the utility, and ultimately to the consumer.

2. Reliability and Life

PCBs are thermally and oxidatively more stable than mineral oils, and discharges, which can occur in capacitors, are less likely to generate gases from askarels than from mineral oils. The chemical stability of PCBs in the presence of capacitor tissue and plastic films and the favorable stress distributions between solid and liquid have made it possible to design low-cost capacitors with a life expectancy of more than 10 years life in lighting applications and more than 20 years in electric utility applications. In each application the first-year failure rates are less than 0.2 percent. This level of life and reliability had not been achieved prior to the introduction of PCBs.

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Table 3

Alternate Insulating Fluids

Some Significant Properties of Certain Candidate Insulating Fluids to Replace Aroclor 1242

Fluid	Dielectric Constant, ϵ'_r, at 25° C	Cleveland Open Cup Flammability Flash Point - °C - Fire Point		Density	Cost, ¢ lb
Aroclor 1242	5.85	194	333	1.38	18
Aroclor MCS 1016	5.85	191	319	1.36	18
Aroclor MCS 1043	5.7	160	244	1.28	18
Mineral Oil	2.25	145	150	.9	3

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3. Safety

The relative non-flammability of PCBs significantly reduces the fire hazard that might otherwise accompany those failures that result in rupture of the case.

B. OTHER LIQUIDS

1. Castor Oil. The dielectric constant of castor oil is 4.5, and this material is useful as an impregnant in D.C. energy storage capacitors. However, A.C. capacitors filled with this liquid have relatively short lives and are not very stable under A.C. discharges and in the presence of water derivable from the cellulosic paper.

2. Dibutyl sebacate. This ester is especially useful in high frequency parallel plate capacitors because of its low, flat loss characteristics over a broad frequency range. In this type of construction the liquid is the sole dielectric material. When used in conjunction with paper, this ester is also unstable.

3. Silicone Fluids. These materials have a dielectric constant of 2.7 and would generally be subject to the same disadvantages as mineral oil.

In the interest of achieving a higher degree of environmental compatibility the capacitor industry switched during 1971 from Aroclor 1242 to Aroclor MCS 1016, from which the higher-chlorinated persistent fractions have been substantially removed.

IV. ENVIRONMENTAL PROTECTION

The advantages to the public in terms of safe, reliable, and efficient electrical equipment made possible by the use of PCBs have been documented in the body of, and especially Appendix B to, this report. It is also clear that there are no present or prospective substitutes for these materials, and that the functions they perform are essential. Thus the continuing need for PCBs in closed electrical system applications is conclusive. The electrical industry well understands, however, that continued use of these materials requires unusual protective measures. These measures were the subject of recommendations made by a previous NIPCC Sub-Council report (The Use and Disposal of Electrical Insulating Liquids, June 1971) and are judged to be well on their way toward implementation: witness the introduction of the new capacitor dielectric, the provision of facilities for the incineration of liquid and solid wastes, and the instructions to operating personnel and users regarding the need for care in waste disposal, an activity now being further formalized and strengthened by ANSI's committee C107. The annual residual leakage to the environment from the continued use in transformers and capacitors has been estimated between one part in a thousand and one in ten thousand of the existing environmental PCB burden.

---

1. The above paper was prepared by the Electric and Nuclear Sub-Council, National Industrial Pollution Control Council: Chairman, D. C. Burnham, Westinghouse Electric Corporation; Vice Chairman, Fred J. Borch, Chairman and Chief Executive Officer, General Electric Company; Members: A. P. Fontaine, President and Chairman, The Bendix Corporation; Raymond H. Giesecke,

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APPENDIX D

Occurrence, Transfer, and Cycling of PCBs in the Environment

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APPENDIX D

Occurrence, Transfer, and Cycling of PCBs in the Environment

PCBs have been in use for more than four decades, not only in the United States but throughout the developed world. They were not recognized as environmental contaminants until (Jensen, 1) in Sweden identified a series of unknown peaks on gas chromatograms of pesticide analyses as these substances. These first identifications were in fish and bird tissues; examination of other samples soon revealed that PCBs were widespread in biological materials. Existing data suggest that although the greatest concentrations of residues are found in the vicinity of industrial and municipal areas in the Northern Hemisphere, residues exist in areas remote from civilization and in both the Northern and Southern Hemispheres.

Data on sales of PCBs are available only for the United States from 1957-1971, with sales reaching a high of 36,000 tons in 1970, Table 1. Sales doubled 1960-1970; assuming the same growth rate from 1930 to 1970, about 500,000 tons have been sold in the United States. Data from outside the United States are few. It is estimated that Japan manufactured 13,000 tons per year (2). PCBs are also produced in West Germany, the United Kingdom, Spain, France, Italy, Russia, and possibly new producers in Brazil, Argentina, India, and East Germany. Assuming that the United States used half of the world total, world production would have been about one million tons--approximately half the estimated total production of DDT. Monsanto's 1971 sales dropped to half the 1970 level, and 1972 sales are expected to be 12 - 15,000 tons. Prior to 1971, when Monsanto (the sole U.S. manufacturer) curtailed sales to non-closed system uses, about 40 percent was used in plasticizers, hydraulic fluids and lubricants, surface coatings, inks, pesticide extenders, and micro-encapsulation of dyes for carbonless duplication paper--uses that potentially result in environmental contamination.

If the same percentages held worldwide, 40,000 tons might have been used in ways that could easily reach the environment; accidents and careless disposal practices would have increased this amount considerably, perhaps to 50,000 tons or more.

(Nisbet and Sarofim, 3)provided rough estimates of the losses of PCBs to the North American environment in 1970: 1500 to 2000 tons to the atmosphere (mostly Aroclor 1254 to 1260 from plastics and 1242 from burning dumps); 4000 to 5000 tons to fresh and coastal waters (Aroclor 1242-1260); 22,000 tons into dumps and landfills (mostly Aroclor 1242). Other losses were judged to be small, but often locally significant. The total loss to the North American environment from 1930 to 1970 was estimated to be:

Atmosphere	- 30,000 tons
Water - fresh and coastal	- 60,000 tons
Dumps and landfills	- 300,000 tons

The total of 390,000 tons is within a factor of two of the estimate above of 500,000 tons that might have reached the world environment. They further

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TABLE 1
PCB MANUFACTURING AND SALES
DATA FROM MONSANTO INDUSTRIAL CHEMICALS CO.
1957 THROUGH 1971
(Thousands of Pounds)

	1957	1958	1959	1960	1961	1962
TOTAL PRODUCTION (For Domestic Sales)(1)				37919	36515	38353
DOMESTIC SALES	32299	26061	31310	35214	37538	38043
DOMESTIC SALES BY CATEGORY						
Heat Transfer	-	-	-	-	-	157
Hydraulics/Lubricants	1612	1549	2685	2523	4110	3915
Misc. Industrial	704	755	1569	1559	2114	1681
Transformer	12955	5719	5984	7921	6281	7984
Capacitor	17028	14099	16499	16967	15935	15382
Plasticizer Applications(2)		3939	4573	6244	9098	8924
Petroleum Additives	-	-	-	-	-	-
Total	32299	26061	31310	35214	37538	38043
DOMESTIC SALES BY PCB GRADE						
Aroclor 1221	23	16	254	103	94	140
Aroclor 1232	196	113	240	155	241	224
Aroclor 1242	18222	10444	13598	18196	19827	20654
Aroclor 1248	1779	2559	3384	2827	4023	3463
Aroclor 1254	4461	6691	6754	6088	6294	6325
Aroclor 1260	7587	5982	6619	7330	6540	6595
Aroclor 1262	31	184	359	326	361	432
Arcolor 1268	-	72	102	189	158	210
Total	32299	26061	31310	35214	37538	38043

Note: (1) Production amounts prior to 1960 are not available.
(2) Amounts for plasticizer applications prior to 1958 are not available.

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TABLE 1 (cont.)

	1963	1964	1965	1966	1967	1968	1969	1970	1971	Prospect 1972
U.S. PRODUCTION	44734	50833	60480	65849	75309	82854	76387	85054	40471	25-30 m
DOMESTIC SALES (LBS.)	38132	44869	51796	59078	62466	65116	67194	73061	37635	25-30 m
U.S. EXPORT SALES	3647	4096	4234	6852	8124	11231	10624	13651	9876	?
U.S. DOMESTIC SALES BY CATEGORY										
Heat Transfer	582	929	1237	1766	2262	2529	3050	3958	3480	-
Hydraulics/Lubricants	3945	4378	4616	4258	4643	5765	8039	7403	1643	-
Misc. Industrial	1528	1692	1841	1779	1426	1283	1079	1427	578	-
Transformer	7290	7997	8657	8910	11071	11585	12105	12928	11528	25-30 m
Capacitor	15606	19540	23749	28884	29703	29550	25022	26708	17305	25-30 m
Plasticiser Applications	9181	10337	11696	13481	13361	14404	16460	19537	3102	-
Petroleum Additives	-	-	-	-	-	-	1439	-	-	-
U.S. DOMESTIC SALES BY PCB GRADE										
Aroclor 1221	361	596	369	528	642	136	507	1476	1600	300
Aroclor 1232	13	13	7	16	25	90	273	260	211	300
Aroclor 1242	18510	23571	31533	39557	43055	44853	45601	48588	21000	4000
Aroclor 1248	5013	5238	5565	5015	4704	4094	5650	4073	261	-
Aroclor 1254	5911	6280	7737	7035	6696	8891	9822	12421	5800	6000
Aroclor 1260	7626	8535	5831	5875	6417	5252	4439	4490	1750	600
Aroclor 1262	414	446	558	768	840	720	712	1023	-	-
Aroclor 1268	284	190	196	284	287	280	300	330	-	-

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estimated that one-third of the PCBs released to the air and one-half of those released to water have now been degraded. The PCBs in dumps probably have undergone less degradation.

Given the diversity of uses of PCBs and their chemical stability (greater stability in the higher chlorine species), it is not surprising that residues are now widespread. While satisfying quantitative estimates of the contribution of various pathways into the environment are not possible with existing data, there are enough data to be certain that they do reach the environment at least from the following sources:

-- Open burning or incomplete incineration (at usual temperatures) of solid wastes, municipal and industrial. Incineration at 2000 F or above for two seconds will destroy PCBs, but poorly operated incinerators or open burning may result in PCBs being released to the atmosphere unchanged.

-- Vaporization from paints, coatings, plastics, etc. (Nisbet and Sarofim, 3) estimate that as much as 20 percent may be vaporized.

-- Municipal and some industrial sewers (present in treated as well as untreated wastes). Tables 2 and 3.

-- Accidental spills or improper waste disposal practices.

-- Formerly, direct application to the environment as ingredients of pesticides or as carriers for pesticides (such uses are now prohibited).

-- Dumping of sewage sludge, municipal and industrial solid waste, and dredge spoil at sea.

-- Sewage sludges disposed of on land.

-- Migration from surface coatings (paints, etc.) and packaging materials into foods and feeds.

Probably the largest amounts of PCBs circulating in the environment reach it through industrial and municipal discharges to inland and coastal waters. Tables 2, 3, and 4 present data on such discharges. Based on Table 4, we can estimate 6,000 tons per year may reach these environments.

In addition, PCB residues occur in sludge from municipal sewage systems. Table 5 presents results of analyses from several such sludges. Sewage sludge is disposed of by incineration, landfill, spreading on the land, and dumping at sea. Four million tons per year reach the Atlantic Ocean and Gulf of Mexico, which would include only 10 or so tons of PCBs (4). Analysis of the waste water from the effluent scrubbers of three sludge incinerators showed no detectable residues of PCBs (level of sensitivity 0.1 part per billion), suggesting that most PCBs had been destroyed by incineration. The total amount of PCBs contained in the sludges would not be more than ~70 tons per year.

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TABLE 2 - CONCENTRATION OF PCBS IN MUNICIPAL SEWAGE TREATMENT PLANT OUTFALLS

Collection Site	Collection Date	Aroclor Compound Detected	µg/l (ppb)	Flow per Day Mgd 1/	Est. PCB Discharged per day (lbs.)	Source of Data
Ohio - Miami River						
Dayton	1-19-71 0800 to 1-20-71 0800	1254	17	48	6.2	EPA Unpb. Data
Hamilton	1-19-71 0000 to 1-19-71 2400	1248	10	8	0.6	"
Middleton	1-19-71 0800 to 1-20-71 0800	ND*	-	-	-	"
Wisconsin - Milwaukee River						
West Bend	3-26-70	1254	0.25	1.4	0.002	Veith & Lee
Fredonia	"	1254	0.12	0.1	0.002	"
Saukville	"	1260	0.13	0.1	0.002	"
Grafton	"	1254	0.04	0.8	0.002	"
California						
East Bay (San Francisco)	12-70	1254	3.1-3.8	155	4.2	Schmidt, et al, '7.
San Francisco	"	1254	3.8-5.8	31.5	1.2	"
Terminal Island	"	1254	5.8-12.8	9.3	0.7	"
Orange County	"	1254	0.21-0.64	130	0.4	"
Hyperion	"	1254	0.16-0.37	340	0.7	"
White Point	"	1254	76	350	213	"
Richmond		ND*		-	-	
San Diego		ND*		-	-	
Oxnard		ND*		-	-	

*ND - Not Detected

1/ mgd = million gallons per day = (8,000,000 lbs./day)

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TABLE 1. PCB CONCENTRATIONS IN INDUSTRIAL EFFLUENTS

Location	Kind of Industry	Date	Aroclor Compound Detected	Concentration in Effluent (ppb)	Source of Date
Saukville, Wisc.	Chemical Plant	3/70	1242	2.50	Vieth and Lee, 1970
Ohio- Great	Paper Coating Co.	1/71	1242 & 1248	27	EPA data- Analytical Quality Control Lab.
Miami River	Paper Treatment	1/71	1242	430, 470*	"
	Appliance	1/71	1254	5	"
	"	1/71	1254	18	"
Florida- Escambia River	Chemical Plant	4/69-10/69	1254	2.5-275	Duke, et al., 1970

*Samples from treatment lagoon

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TABLE 4

TOTAL ESTIMATED CONTRIBUTION OF PCBS TO THE AQUATIC ENVIRONMENT

Municipal Outfalls

Assume: 150,000,000 sewered population x
130 gallons sewage per person per day x
8 pounds per gallon of sewage =
Approximately 160 billion lbs./day.

With concentration of 0.1 ppb in sewage, 16 lbs./day;
With concentration of 10 ppb in sewage, 1600 lbs./day.
[Note that only the White Point outfall and Dayton (largely serving industrial communities) exceed the 10 ppb concentration]

Annual contribution would not exceed 300 tons from this source, even if the average concentration in municipal sources was 10 ppb.

Industrial and Other Sources

Basis for Estimate:

Concentrations in the Great Miami River of 5.8 ppb and flow rate of 728 cfs yield estimated daily carriage to the Ohio River of ~95 lbs. per day. Contribution from the sewage treatment plants at Dayton (6.2 lbs./day) and Hamilton (0.64 lbs./day) account for 6.8 lbs. (~7% of the amount present in the river).

In the Milwaukee River, the estimated discharge of PCBs to Lake Michigan, based on a concentration in the water of 0.15 ppb (Veith and Lee, 1970) and flow rate of 500 cubic feet per second, is ~ 0.5 lb. per day. Contributions from the sewage treatment plants at West Bend, Fredonia, Saukville, and Grafton, total 0.002 lbs./day, (about 0.4% of the amount present).

Extrapolation:

The Great Miami River drains a heavily industrialized area and represents something near the upper limit of PCBs to be expected in municipal discharges. The Milwaukee River is less industrialized. If one assumes that municipal sources contribute on the average not more than 5% of the total, the annual contribution from other sources would be on the order of 300 x 20 = 6,000 tons per year.

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14 17 5. CONCENTRATION OF PCBs IN SEWAGE SLUDGES

Collection Site	Date	Aroclor Detected	Concentration (ppb)	Sludge per day tons/day	Est. PCB Content Day (lbs.)	Source
California						
Hyperion (Los Angeles)	12/70	1254	8; (78.5-92.1)	20,000 1/	3.2	Schmidt, et. al., (13)
Barstow	7/21/71	1254	1400	1.4	.004	EPA Unpublished data
Ohio						
Dayton (Miami River)		1254	105,000	47.9	10.1	EPA Unpublished data
Little Miami (Cincinnati)		1254	32,000	20.2	1.3	" " "
Mill Creek (Cincinnati)		1254	12,700	83.3	2.2	" " "
Lebanon (Turtle Creek)		1254	2,500	1.0	.005	" " "
Shayler Run		1254	3,200	-	-	" " "
Virginia						
Lorton		1254	1,200	-	-	" " "
Indiana						
Indianapolis		1254	3,800	126.1	1.03	" " "

1/ This number is based on outfall discharge and represents a relatively dilute sludge. The estimated PCB content in lbs./day is the important figure here.

Assumptions: Each million gallons of sewage contains about 1 ton of sludge. The daily output of sludge, then is 130,000,000 severed population x 130 gal. sewage per day = 19,500,000,000 gallons per day and 19,500 tons of sludge per day.

At 10 ppm of PCBs (highest level found), the daily output would be 19,500 tons x 2000 lbs. = 39 million lbs. x 10 ppm = 390 lbs. per day, at 1 ppm, 39 lbs./day. These would be respectively 70 and 7 tons/year.

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By far the largest quantities of PCBs must end up in dumps and landfills. As noted above, combustion will doubtless release some PCBs to the atmosphere. Little is known about concentrations in landfills, degradation, leaching or vaporization. Much of the material here will be in sealed containers, and will be sequestered or only slowly released to the environment. Analyses of stagnant water close to a Swedish landfill were below the level of detection of 4 parts per billion, suggesting little leaching from such sources (5).

PCBs are known to have reached the environment or man's food supply in a variety of other ways, no one of which is important as a source of environmental contamination, but each of which may have serious consequences locally. Spent transformer oil containing PCBs, used as an herbicide carrier, contaminated dairy cattle grazing area and resulted in residues in milk. Silo paints containing several percent of PCBs are thought to have migrated into silage, and in [illegible] resulted in residues in milk (6). A leak in a heating element used in pasteurizing fish meal resulted in contamination of poultry feed which, in turn, resulted in reduced hatchability of eggs in some chicken flocks, and residues in excess of the FDA interim action level in some eggs and meat (6). In Japan, rice oil contaminated from leakages during heat treatment resulted in poisoning of hundreds of people and the only known disease attributable to PCBs. Residues in packaging materials have contaminated the foods they contained; presumably, most of the residues came from recycled paper which had included "carbonless" carbon paper with relatively high PCB levels. Virgin paper products have also been shown to contain PCBs, and their source of contamination is not well defined at this time. There are other cases of food contamination in which the source of the contaminant has not been identified.

From the sediment measurements, we can crudely estimate the burden in sediments underlying inland waters in the continental United States. There are about 58,000 square miles of such sediments. Assuming sediment has a specific gravity of 2.5; residues are in the top 3 inches; the weight of 3 inches of sediment is $\frac{2.5}{1} \times 62.4$ (wt. of a cubic foot of water) x 43,560 sq. feet/acre $\simeq$ 1,600,000 lbs./acre, or $\simeq$1 billion lbs. per square mile (1.6 million x 640). At 10 parts per billion, the PCB burden would be 58,000 sq. miles x 10 lb./sq. mile = 580,000 lbs. At 100 parts per billion, the PCB burden would be 5,800,000 lbs. -- 290 to 2900 tons. The higher estimate is less than 1/10 the amount Nisbet and Sarofim (3) estimate may be present in freshwater and coastal sediments.

I. OCCURRENCE IN THE ENVIRONMENT

Thousands of samples from various parts of the environment have been analyzed for PCBs. Table 6 presents selected data on occurrence in air, water, sediments, and various living organisms.

In air and water away from immediate sources of waste discharge, levels are low--. few nanograms per cubic meter (parts per trillion, ppt) in air and marine waters, and less than a part per billion (ppb) in fresh water; soil and bottom sediments contain a few parts per billion, up to several hundred parts per million (ppm) near some industrial outfalls; from tenths of a parts per billion to tens of parts per million in fish and up to hundreds of parts p

MONS 218918

TABLE 6. A SAMPLING OF MEASURED OCCURRENCES OF PCBS IN THE ENVIRONMENT

	Location	No. Samples	Date	Aroclor Compound Detected	Concentration (ppb)	Source of Data	Remarks
Air							
Precipitation	United Kingdom		1968	N.S.	Detected but not quantified	Tarrant and Tatton, 1968	
	Florida		1971	N.S.	Below level of quantification	USGS- Unpbl.	
	Swaden		1970	N.S.	Present in snow	Smithsonian Inst., CFSLP- 1970	
Suspended Particulate	4 U. S. cities		1968-1970	N.S.	~27-230 ppm on suspended solids	EPA- Unpbl.	Quantification questionable
Water							
	Great Miami River, Ohio	19	11/70	1242	ND to 15.8 $\bar{x}$ = 5.7	EPA- Unpbl.	3 samples above Dayton below level of detection. Mean of 16 samples 5.7
	Ohio River	2	11/70		ND	"	
	Big Sumico River, Wisc.		-		<0.01	Veith, 1972	
	Pestigo River, Wisc.		11/70	1254	0.31	"	
			4/71	"	0.38	"	
			Summer '71	"	<0.01	"	
	Oconto River Wisc.		11/70	1254	0.45	"	
			4/71	"	0.16	"	
			Summer '71	"	<0.01	"	
	Milwaukee River	10	1970	1242 1260	0.03-2.07, $\bar{x}$ 0.29 0.02-0.13, $\bar{x}$ 0.08	Veith and Lee, 1970	

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TABLE 6 (Continued)

Location	No. Samples	Date	Aroclor Compound Detected	Concentration (ppb)	Source of Data	Remarks
Water (continued)						
Green Bay, Misc.	-		1254	0.04-0.07	Veith, 1972	
Lake Michigan		Summer 1970		0.013	Veith, Personal Communication	$\bar{x}$ of 12 samples ½ mi. off 12 river mouths.
South Florida		6-7/71	N.S.	<0.01-0.02	USGS, Unpbl.	
Escambia River & Bay, Fla.		Fall '69	1254	ND to < 0.1	Duke, et. al. 1970	
Irish Sea		10/69	N.S.	<0.01	Holdgate, 1970	
Sediments						
11 lakes in Pennsylvania		1971	N.S.	<10-50	USGS, Unpbl.	Data considered good to within ± 50%
7 locations in S.E. Florida		1971	N.S.	10-3200	"	
4 locations in West Central Fla.		1971	N.S.	< 10-20	"	
6 locations in S. Florida			N.S.	10-1500	"	
Escambia Bay, Florida		8/69	1254	max. of 486,000	Duke, et al., 1970	Near industrial outfall
		8/69	1254	1700	"	
		8/69	1254	< 300	"	6 mi. from outfall

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TABLE 6 (Continued)

	Location	No Samples	Date	Aroclor (compound detected	Concentration (ppb)	Source of Data	Remarks
Biota							
Marine Plankton	North Atlantic		1971	N.S	$\bar{x}$ 200	Harvey in Nesbit & Sarofim, 1972	
Zooplankton	Irish Sea	7	10/69	N.S.	10-30	Holdgate in Nesbit & Sarofim, 1972	
Invertebrates							
Mussels	Irish Sea	(about 200)	10/69	N.S.	50-500	"	
"	Baltic Sea	40	1965-1968	N.S.	4300 (1900-8600)	Jenson, et al., '69	
"	Stockholm Archipelago	15	"		5200 (3400-7000)	"	
Oysters	Escambia Bay, Fla.	18	1971	1254	650 (100-1400)	EPA- Gulf Breeze, Unpbl.	
"	"	2	1970	"	840 (710-970)	"	
"	"	2	1969	"	1050 (1000-1100)	"	
	Florida	8	1964-1970	"	1400-2700	"	
	Georgia	12	1967-1970	"	2000	"	
	S. C.	3	1965-1969		Present but not quantified	"	
Blue Crab	Florida	10	2-3/70		"	"	
Crabs	S. C.		1969	N.S.	<100	Duke, et al., '70	
"	Escambia Bay, Fla.		1969	1254	1000-7000	"	
Shrimp	"		1969	1254	1900-2500	"	
Norway Lobster	Irish Sea	33			10-100	Holdgate 1970 in Nesbit & Sarofim, 1972	

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TABLE 6 (Continued)

	Location	No. Samples	Date	Aroclor Compound Detected	Concentration (ppb)	Source of Data	Remarks
Biota (continued)							
Fish							
Marine (species not stated)	North Atlantic		1971	N.S.	100	Harvey in Nisbet & Sarofim, 1972	
Herring	Baltic Sea	18	1965-1968	"	6800 (500-2300)	Jensen, et al., '69	
"	Stockholm Archipelago	4	"	"	5100 (3300-8500)	"	
"	Irish Sea	154	1969	"	10-2000	"	
10 species	Bay of Fundy Gulf of Me.		1971	1254-1260	70-1540	Zitko, et al., 1972	
Estuarine							
Menhaden	Florida		8/70	1254	6700	EPA- Gulf Breeze Lab., Unpubl.	
"	"		10/69	1254	7300	"	
Freshwater							
Nationwide fish-pesticide monitoring							
	1969. At least some fish at 47 of 50 sampling stations contained more than 100 ppb of PCBs (the lower limit of detection). Levels ranged from <100 to 14,800 ppb. Henderson, et al., 1971.						
	1970. Only 1 fish of 40 sampled contained less than 1000 ppb. The highest 20 fish averaged 36,000 ppb, ranging from 9600 to 213,000 ppb. Fish from the Ohio River and the Hudson River contained the highest residues-- 4 fish from the Ohio averaged 80,000 ppb; one fish from the Hudson River contained 213,000 ppb. Other waters in the top half included the Yazoo River, Allegheny River, Delaware River, Cape Fear River, Mississippi River, Missouri River, and Lake Ontario. (Stalling and Mayer, 1972)						

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TABLE 6 (Continued)

	Location	No. Samples	Date	Aroclor Compound Detected	Concentration (ppb)	Source of Data	Remarks
Biota (continued)							
Birds - Land							
Starlings	Continental U. S.	124	11-12/70	N.S.	$\bar{x}$ 660 (50-24,300)	Bureau of Sport Fisheries & Wildl., Unpubl.	
Woodcock	N.S. - Northern U. S.		Fall 1971	N.S.	4000-9000	"	
Bald Eagle	25 states	69	1966-68	N.S.	Not quantified	"	
Birds - Water							
Guillemot Eggs	Baltic Sea	9	5/68		250,000	Jensen, et al., 1970 (22)	
White-tailed Eagle	Stockholm Archipelago	4	3/65-6/66		14,000,000, 8,400,000-17,000,000	"	
Heron	"	4	4/67		9,400,000	Jensen, et al., 1969 (19)	
Double-crested Cormorant (eggs)	Bay of Fundy		1971?	1254	17,200	Zitko, et al., 1972 (20)	
Abdominal fat				1254	52,000	"	
Herring Gull Fat	Bay of Fundy			1254	75,000	"	

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TABLE 6 (Continued)

	Location	No. Samples	Date	Aroclor Compound Detected	Concentration (ppb)	Source of Data	Remarks
Biota (continued)							
Mammals - Sea							
Gray Seal	Baltic Sea	2	9-11/68	N.S.	30,000	Jensen, et al., 1969 (19)	
Gray Seal	Stockholm Archipelago	3	5/68	N.S.	30,000	"	
Man							
Plasma	South Carolina	723	1968	1254-1260	43% of samples up to 29	Finklea, et al., 1971 (23)	
Milk	Sweden	22			$\bar{x}$ 40	Westoo, et al., 1970 (24)	
	California	-			$\bar{x}$ 60	Risebrough & Brodine, 1969 (25)	
	Germany	-			$\bar{x}$ 100	Acker and Schulte, 1971 (26)	
Fat	Germany	-			5700	"	
	United States	235			N.D.	Yobs, 1972 (27)	
		229			<1000		
		188			1000-2000		
		36			>2000		

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-- Unknown

N.S. Not specified

N.D. Not detected

million in some fish and birds near the top of the food chain (1/8 of an inch is about one trillionth of the distance to the moon; and a part per million is about 5 steps on a walk from Washington to San Francisco). Man, who is also at the top of a food chain, carries residues ranging up to 2 parts per million or occasionally more.

II. BEHAVIOR IN THE ENVIRONMENT

A. Air - The relative importance of the atmosphere as a transport mechanism is not known. While PCBs have been identified in air, the residence time, transformations, and movement from air to land or water surfaces through fallout or rainout, or return to the atmosphere are virtually unknown. There are at least two observations that suggest substantial aerial transport; data on residues in fish in Lake Minto in a remote part of northern Quebec (7), and residues in woodcock which feed almost exclusively on earthworms, which in turn pick up residues from the soil. Only by invoking aerial transport can we account for residues in arctic lakes or in more or less wilderness areas of the North where woodcock summer. Nisbet and Sarofim (3) suggest airborne PCBs will have been adsorbed on particles and have a relatively short residence time--thus most will have been redeposited on the U. S. continent, but some will have reached the oceans.

B. Water and Sediment - The water environment is probably the principal sink and transport mechanism for PCBs. Calculations based on measured occurrences in municipal and industrial outfalls, in the receiving waters, and the downstream reaches of the waterways demonstrate transport through the aquatic system. Measured residues in fishes from various environments suggest accumulations at the downstream ends of the drainageways.

There are few data on removal, disappearance, and sequestering of the substances in soils or bottom sediments of rivers, lakes, estuaries, or the ocean. Table 6 includes some data that indicate presence in bottom sediments, and suggest that sediments may be a major reservoir of PCB residues. Work by Nimmo and his colleagues at Gulf Breeze (8) has shown that at least pink shrimp and fiddler crabs are able to take up PCB residues from this source. Fiddler crabs and pink shrimp exposed to clean flowing sea water in aquaria containing sandy silt with initial residues of 61 parts per million (dry weight basis) of Aroclor 1254 accumulated an average of 80 ± 25 parts per million in the whole crab and 240 parts per million (one pooled sample) in the hepatopancreas of the shrimp. Accumulation was much less, 17 ± 9 parts per million and 6.1 parts per million, respectively, with silt initially containing 30 parts per million. Some accumulation took place 3.2 ± 0.9 parts per million (in crabs) and 1.1 parts per million (shrimp hepatopancreas) from silt initially containing 2.5 parts per million. The same investigators have shown transfer of residues from sediments to overlying water. Effluent water from the aquarium with 61 parts per million Aroclor in sandy silt contained 3.5 parts per billion; from the aquarium with 30.0 parts per million in silt, effluent water contained 0.5 parts per billion.

III. EXPOSURE AND BIOLOGICAL ACCUMULATION

Experimental work on biological accumulation by individual species of vertebrates and invertebrates has been conducted by a number of laboratories in the United States and elsewhere. Table 7 presents selected data that demonstrate accumulation factors of up to 75,000 in whole organisms, and in the

MONS 218925

TABLE 7. ACCUMULATION OF PCBS BY VARIOUS AQUATIC ORGANISMS

[illegible]	Aroclor Compound	Exp. Time	Environmental Concentration (ppb)	Residue (ppb)	Concentration Factor	Source
Catfish	1248	60 da.	13.3	953,000	72,000	Stalling and Mayer, 1972
	1254	60	4.1	312,000	76,000	"
Bluegill	1248	60	4.9	312,000	63,700	"
	1254	60	6.8	87,000	12,800	"
Fiddler Crab	1254	30	3.5	80,000	22,900	"
			0.5	17,000	34,000	"
Pink Shrimp	1254	30	3.5	240,000	69,000	"
			0.5	6,100	12,000	"

MONS 218926

hepatopancreas of pink shrimp. The data reported in the preceding section demonstrate that pink shrimp are able to accumulate PCB residues from environmental levels as low as 0.5 parts per billion; and Table 7 shows accumulation by fish from levels as low as 1 part per billion.

Evidence from environmental samples (Table 6) suggests uptake of PCB residues from exceedingly low environmental concentrations. Thus the plankton samples from the North Atlantic contain something like 200 parts per billion, yet PCB levels in marine waters are believed to be exceedingly low--certainly less than 0.01 parts per billion.

PCBs, like many of the organic insecticides, are fat soluble, and are stored in the lipids of animals. Like the insecticides, they resist metabolic changes, and tend to be concentrated (at least to some extent) at succeedingly higher levels as they pass through various steps in the food chain.

The data presented in Table 6 suggest that there are two components of movement through the biota. One is the familiar pattern of food chain accumulations. The other involves direct uptake from the environment by various trophic levels; e.g., soil to earthworms; water to phytoplankton, zooplankton, larger invertebrates, and fish. The fish and plankton data from the North Atlantic reported by Nisbet and Sarofim (3) are consistent with the hypothesis, in that plankton residue levels are higher than fish levels, suggesting direct accumulation rather than food chain transfers. So, too, is the evidence from feeding studies reported by Stalling and Mayer (9) that suggest accumulations of no more than a factor of 2 over dietary intake levels in fish. It seems reasonable that food chain transfers are the principal route of accumulation in warm blooded vertebrates, and possibly in the highest levels of carnivorous fish. Conversely, direct environmental uptake is probably the most important for aquatic invertebrates and fish.

That humans are exposed to PCBs is evident from the data in Table 6. There are a number of possible routes: air, water, food. Fish and shellfish through uptake from water would be expected to provide the principal continuing source in the diet. Sampling of fish to keep those containing more than the FDA interim action level from the market is carried out by FDA and the various States where fish are known to have substantial PCB contamination. Other foods have been found to contain PCB residues, but these residues are for the most part traceable to accidents; e.g., residues in eggs and poultry whose diet included fishmeal contaminated by leakage of PCBs from processing equipment (Monsanto reports they no longer sell PCBs for this purpose); residues in milk traceable to silage stored in silos painted with PCB-containing paints; residues in dry food packaged in PCB-contaminated packaging materials. Aside from the occurrences traceable to incidents such as the above, residues have been found in only 479 of 15,000 food samples by FDA during November 1969-June 1971 (200 of the 479 were followups on samples found to contain PCBs). In the FDA diet study during FY 70 and 71, only 22 of 720 composite samples contained PCB residues. It is clear that only a small fraction of the U. S. food supply contains detectable levels of PCBs.

MONS 218927

Other routes by which man may be exposed, or may have been exposed, include breathing of PCB-containing house dust and dermal uptake from carbonless copy paper or PCB-containing inks. One sample of house dust from Michigan was reported to contain 200 parts per million of PCBs (10). Carbonless "carbon" paper was reported to contain 2-6 percent of PCB Kanechlor 300 (11); experiments with this paper demonstrated that PCBs rubbed off when handled, and that even after washing the hands, approximately two-thirds of the PCBs still remained on the skin. Dermal uptake through intact skin has been demonstrated in the rabbit, guinea pig, and rat, and presumably would occur in man.

IV. DISCUSSION

PCBs occur widely in the environment. It seems reasonable that by far the largest amount is present in dumps and landfills where it is thought to be more or less sequestered from the rest of the environment.

It is clear from environmental samples that smaller but significant amounts are present in the terrestrial and aquatic environments. Much smaller total amounts are present in the biota, but levels in some organisms in some places are sufficiently high to cause undesirable biological effects. The residues present in soils and bottom sediments are potentially available for transfer to the biota, directly or through movement to water and uptake by aquatic organisms.

A relatively small amount of PCBs is required to contaminate a large part of the biota (for example, 10 tons would be sufficient to contaminate the entire U. S. population to a level of 1 part per million). Organisms can accumulate residues from remarkably low environmental concentrations. PCBs have been shown to accumulate in fish and aquatic invertebratee to levels of 75,000 times that present in the water (up to 200,000 times in selected tissues), and to be accumulated from concentrations as low as 0.06 parts per billion. Thus, to prevent levels in fish from reaching the 5 parts per million established by FDA as the interim action level for fish as human food, concentrations in water would have to be less than 0.07 parts per billion, or, to allow some safety factor, 0.01 parts per billion. This level should be sufficiently low that fish and shellfish would not be adversely affected.

Monsanto has taken a number of voluntary steps to reduce the amounts of PCBs reaching the environment--both through restricting sales for such uses and by providing a disposal service for its customers. (During the first year after this service was announced, more than 500,000 pounds accumulated awaiting disposal in the 10,000,000 pounds-per-year incinerator being constructed (3). Despite these steps, substantial amounts of PCBs are still reaching the environment. They are present in detectable levels in virtually all municipal sewage effluents. Effluents from many industrial plants such as paper mills, appliance manufacturers, electrical equipment manufacturers, and chemical industries, included higher levels than municipal sewage. As the restrictions continue, a decrease in residues should occur through gradual exhaustion of existing stocks and uses.

When the restrictions become fully effective, the principal source to the aquatic environment can be expected to be that part of the electric equipment manufacturing industry and the electric utility industry that require these valuable materials because of their fire resistance and dielectric properties

MONS 218928

The effluents from such installations should be regulated and closely monitored to assure that no more than 0.01 parts per billion results in the receiving water. (So, too, should the manufacturing and disposal facilities of Monsanto.) Good housekeeping should permit this level to be achieved. An educational campaign aimed at users to assure proper disposal will also be necessary--so long as the materials are referred to as transformer oils, cutting oils, hydraulic oils or fluids, etc., care in disposal will be hard to assure. After all, oils in moderate quantities aren't regarded as troublesome substances.

V. RESEARCH NEEDS AND OPPORTUNITIES

1. Data provided by Kuratsune and Masuda (11) suggest that PCB-containing carbonless copy paper may have been an important source of PCB residues in man. An epidemiological study, involving a group of regular users of such copy paper (airline ticket salesmen; clerical workers; etc.), would shed much light on this question.

2. The detection of high levels of PCBs in house dust by Price (10) suggests that inhalation may be an important source of PCB levels in man. Both the question of occurrence in dust and of respiratory uptake from such dust should be explored.

3. Residues of PCBs have not been determined in soils, though by inference they must be present. A set of samples from the program of pesticides monitoring in soils should be analyzed for PCBs; the set should be drawn with care to illuminate distribution patterns in, near, and remote from industrial areas.

4. Data on pesticides in air are unsatisfactory. A few samples, including both vapor and particulates, should be collected from industrial areas and analyzed. If the methodology proves satisfactory, a small-scale survey should be undertaken to determine the importance of the atmosphere as a transport mechanism.

5. The presumption that PCBs do not move to ground water should be tested. The volume of water in this reservoir, coupled with its relatively long residence time, suggests that even very low levels of contamination may be significant.

6. Dumps and landfills are thought to be the principal reservoir of PCBs, but there are virtually no data on behavior of PCBs in these locations. Small-scale sampling should be undertaken to determine the concentrations brought to dumps, the fate of PCBs from open burning, and into leachate and gases from sanitary landfills. Degradation in place should also be investigated.

7. The presumption that submerged sediments contain a large amount of PCBs should be examined. Such questions as vertical distribution, degradation, movement, transfer of water, should be explored as well as the current distribution of residues beneath inland and inshore marine waters.

8. The reported finding of PCB residues on the order of 0.2 parts per million in marine plankton of the mid-North Atlantic requires elaboration.

MONS 218929

PCB content of plankton from equal volumes of water in inshore and mid-ocean waters, as well as sampling of the surface film in both areas, would be informative.

9. Carbon filter samples going back to the mid-1960's are available from some fresh water locations. If a satisfactory analytical method can be worked out, samples from a few locations with continuous records should be analyzed to provide some data on trends that might be useful for correlation with manufacturing data. Fish samples should be considered for the same purpose.

1. Jensen, Soren. 1966. Report of a new chemical hazard. New Scientist, 32:612.

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APPENDIX E

Occurrence and Sources Of PCBs In Food

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APPENDIX C

Occurrence and Control of PCBs in Food

Residues of polychlorinated biphenyls (PCBs) as potential food contaminants were first identified by (Jensen, 1) in fish from various Swedish waters. Other early studies on the occurrence of PCB residues in foods were directed to PCB interferences in the determination of organochlorine pesticide residues, particularly DDT and its analogs. (Widmark, 2).

In 1967 the Food and Drug Administration initiated a methods development project to determine the analytical behavior of PCBs and to devise a means of separating PCBs from chlorinated pesticides in the regulatory analysis of food. Experiments demonstrated that PCBs are recovered and detected by the FDA methodology routinely employed for multiple residues of organochlorine pesticides at a sensitivity of detection approximately one-tenth that for p,p'DDT. For example: using FDA's standardized procedures the limit of detectability for p,p'DDT in butterfat is about 0.15 parts per million, while for PCBs it is about 1.5 parts per million. Further investigation led to a procedure,(Armour and Burke, 3) that separates PCBs from organochlorine pesticides after initial sample extraction and cleanup, and permitting separate determinations of the groups of chemicals. This procedure is designed for use with the FDA multiple pesticide residue procedure as the basic analytical method. The analytical method, along with the PCB-separation step, has application to a wide variety of food and animal feed commodities and many types of environmental substrates.

In July 1969, FDA field laboratories were provided with the analytical instructions for separating and determining PCB residues in foods. Since all objective food samples collected under FDA's pesticide surveillance programs are examined for chlorinated pesticide residues, the advances in analytical methodology facilitated analysis for PCBs in food. The food surveillance programs formally incorporated examination of all samples for PCBs and reporting of results in November 1969. The United States Department of Agriculture incorporated similar procedures in its sampling programs for meat and poultry in January 1971.

The objective sampling programs represent the basic Federal activity for monitoring the Nation's food and feed supply for pesticide residues (Duggan and Cook, 4). The main components of these programs are as follows:

1. FDA PESTICIDE SURVEILLANCE PROGRAM

This program is designed to gather information on the extent of pesticide (including PCBs) contamination of foods and feeds on a geographical basis through the use of a statistical sampling plan. Samples are collected at interstate points to facilitate compliance action when illegal residues, potential residue problems are encountered. FDA field offices select samples manufactured and processed within their areas. Sampling is based on plant locations, volume of production, and other related factors. Commodities may include fresh fruits and vegetables, dairy products, grains, grain products, fish, animal feeds, and processed foods. The limits of detectability as applied to objective samples is about 0.3 - 0.5 parts per million PCBs in fat, and about 1 part per million PCBs in whole milk.

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II. FDA TOTAL DIET STUDIES

The total diet program is designed to determine the levels of pesticides, PCBs, and trace heavy metals in the dietary intake on a geographical and seasonal basis. Market basket samples, representing the two-week diet of a 15-20 year old male -- which is approximately twice that of the normal diet -- are collected at retail stores, bimonthly, in five regions of the United States. Food items are cooked or prepared for table-ready use by dietitians and are divided into 12 food class composites, such as dairy products; meat, fish and poultry; and leafy vegetables. Each composite is analyzed for a variety of chemical contaminants, including PCBs. The limit of detectability as applied to total diet composites is approximately [illegible] parts per million PCBs. When abnormally high residues are detected in any composite, follow-up analysis is made of the individual food commodities of the composite to determine which food is contributing the excessive residues and to determine whether compliance action is warranted.

III. USDA SAMPLING PROGRAMS

The Consumer and Marketing Service, USDA, has primary responsibility for sampling and analyzing meats, poultry, and broken egg products for pesticide, environmental (PCB), and other chemical or biological contaminants. The USDA program involves all federally inspected slaughtering plants (about 1,200) and egg breaking establishments (about 140). The instructions for sampling request that the agricultural producer of the animal, bird, or eggs, be named so that the State of origin will be known. This facilitates follow-up if a violative sample is found and identifies those samples which originate from the same farm. Inspectors are instructed to collect objective samples from different agricultural producers. The time of sampling and the plant location are determined on a random basis, by computer, for this program.

IV. OTHER [illegible] PROGRAMS

In addition to these routine sampling activities, FDA and USDA learn of food contamination of foods in other ways. As part of their enforcement responsibilities, they conduct in-plant establishment inspections; conduct [illegible] investigations and surveys to determine the cause and extent of [illegible] problems; and maintain close contact with State officials [illegible] industry and also monitor the occurrence of chemical contaminants in [illegible].

When required, there is also a corrective phase to these sampling [illegible] investigations. Selective sampling is used to determine the cause of violations when a violative sample is encountered or a report of possible harmful residues is received by the responsible agency. An [illegible] number of samples is taken in the suspected area to determine

the extent of the problem, and the degree of regulatory control required to safeguard the wholesomeness of the food supply and to correct the problem. The selective program has been used to control specific PCB incidents.

V. SOURCES OF CONTAMINATION

Because of their widespread industrial applications, their chemical stability and persistence, and their ubiquitous presence in the ecosystem, it is not unexpected that PCB residues have been detected in a variety of food commodities. Several sources of contamination have been identified. These can be generally divided into three categories:

1. Environmental contamination - background levels of PCBs in fish from contaminated lakes and streams.
2. Industrial accidents - isolated incidents involving direct leakage and spillage or contact of PCB fluids and other PCB containing materials on animal feeds, feed ingredients or food.
3. Food packaging materials - PCB migration to foods packaged in PCB contaminated paper products. Identification of these categories is not intended to imply that all positive PCB findings in food and other materials have been successfully traced to any one of the three sources. Samples have been reported where the cause of the PCB residue was not clearly defined, and one could only speculate as to the source of the residue.

Since examination for PCB residues was incorporated into the routine sampling programs of FDA and USDA, thousands of objective samples have been analyzed. Additionally, numerous investigative surveys and selective samplings have been conducted to respond to specific "accidents" and other problems associated with PCBs in food.

VI. RESULTS OF SURVEILLANCE SAMPLING PROGRAMS

Since November 1969, FDA has analyzed for PCB residues all raw agricultural commodities and other food classes sampled under its pesticide surveillance program. More than 15,000 sample examinations had been completed as of June 1971. A total of 279 of the objective samples was reported to contain PCBs (Table 1). An additional 200 food samples, collected as follow-up samples of suspected lots because previous analyses indicated a potential problem, were also found to contain PCB residues (Table 2).

PCBs were encountered most frequently in fish, with 317 of the total [illegible] samples (479). The levels in fish reported in Tables 1 and 2 indicate that most residues are between 1 and 10 parts per million. The Department of the Interior and others have gathered extensive amounts of data on PCB residues in fish, and it appears that the occurrence of PCB residues in finfish is widespread geographically. Residue levels are related to location (highest in waters near industrial and metropolitan centers) and the species of fish (high or low fat, and feeding habits). In order to control the interstate shipment of fish containing excessive residues of PCBs, FDA (February 1970) established

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[illegible]

[illegible]
[illegible]
[illegible]
Number Positive Samples (Range, ppm) Average, ppm

Standard Metropolitan Statistical Area	Fish	Fish By Product	Cheese[a]	Milk[a]	Shell Fish	Potato By Product	Oysters	Misc	Total Positive All Products
Los Angeles	23(0 1-2 87) 82	3(0 2-5.0)2 10		6(0.15-0 30) 19	1(0 03) 03				35
Philadelphia	2(12-35 20)12 70								2
New Orleans	21(7- 70)0 4[d]							Milled Rice 1 0 20)	24
New York	3(3 23-4 78)2 49								6
San Francisco					1(0.50) 50				1
Seattle	1(0 40) 40					8(0 10-4 20)1.16		Straw 1(0 15) Wheat 1(0 22)	11
Kansas City	15(0 04-15 5)3 61								19
Atlanta	1(0 53) 53[d]		1(T)	2(0 94-0 97) 96				Silage 1(0 82) Silo Coating 1(1) 33	6
Baltimore				22(T-42.58)2 69	5(T-T).00		12(T-T) 00	Crabmeat 1(0 24)	40
Boston	3(4 06-4 08								1
Buffalo	15(T-13 00)3 2[d]	1(T).00							20
Chicago				1(0 23)0 23					1
Cincinnati	55(0 04-4 70)1 37			4(0 22-0,24),24					59
Denver						2(0.15-1,12),64			2
Detroit	49(0.25-15 5)2 56			4(0 49-1 86)1 27				Cat Food 1(6 49) Duco 1(0.70)	55
Dallas									0
Total Positive	396	6	1	35	7	10	12	8	379

[a]ppm fat basis [d]T=Trace, not incl in ave [e]Marine species

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TABLE 2

[illegible] FOLLOW-UP INVESTIGATIONAL SAMPLES collected because of suspected PCB residues November 1970 through June 1971

Number Positive Samples (Range-ppm) Average ppm

Examining District	Fish	Fish By Product	Cheese[a]	Milk[a]	Shell Eggs	Potato By Product	Oysters	Misc	Total Positive All Products
Los Angeles	31(0.1-6.0)1.54		43 (.63-1.9) 30[b]						74
Minneapolis	50(T-9.3)1.97[c]								55
New Orleans	4(0.24-2.0)1.03							Boiled Oyster 1(0.23)	5
New York								Frog Legs 1(0.09)	1
San Francisco									0
Seattle	1(1.98)1.98					2(1.39-1.73)1.56			3
Kansas City	1(0.39)0.39								1
Atlanta	2(0.43-1.23).83[b]			2(6.60-22.80)14.2					4
Baltimore	5(T-T) .00			13(0.57-9.94)4.01	10(T-.01).01			Apple Pomace 1(T)	29
Boston									0
Buffalo	3(1.51-2.29)1.95								3
Chicago				6(0.14-0.24).19					6
Cincinnati	3(1.00-1.50)1.21								3
Denver	3(0.32-0.77) .54[b]								3
Detroit	10(0.73-4.70)2.47								10
Dallas									0
Total Positive	121	0	43	21	10	2	0	3	200

[a]ppm fat basis [b]Import [c]Crease, not incl in ave. [d]Marine species

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an interim action level of 5 parts per million in the edible portion of the fish.

The surveillance data for milk and manufactured dairy products also show this class of food to have a relatively significant incidence of positive findings. For the most part, the PCB sources were traceable to localized "industrial accidents" which are described elsewhere in this report and were not always present as environmental contaminants. The occurrence of PCBs in milk does not appear to be widespread nationally.

Although no PCBs were found in fresh fruits or vegetables, residues were reported in potato by-products used for animal feed. The source of contamination in this case has not been established.

The FDA total diet studies for Fiscal Years 1970, 1971, and 1972 (first-half only) included PCB analysis for 75 market baskets representing 300 composite samples. These analyses showed 54 composite samples to contain PCB residues ranging from a trace to 0.36 parts per million (Table 3). Twenty-six of the positive samples were present in the meat, fish, and poultry composite, and nineteen in the grain and cereal composite. Findings in other food class composites were at less than 0.05 parts per million, with no consistent pattern of PCB occurrence. These studies indicate the dietary intake of PCBs is of a low order. Expressed as mg/kg body weight/day, the PCB level for FY 70 was less than 0.0001 and 0.0001 in FY 71 and FY 72.

The objective phase of the USDA sampling program for meat and poultry during 1971 detected PCBs in 164 of the 4,175 samples analysed. There were 35 samples positive in the 2,404 samples collected from cattle, swine, calves, and sheep with a range in the positive results from .1 parts per million to 3.0 parts per million. The poultry samples reflected the contaminated feed supply in the Southeastern United States and in the 1,804 samples analysed, there were 140 positive with an analytical range of 1 parts per million to over 15 parts per million. The three poultry classes, young chickens, fowl, and turkeys, all had between 7 - 9 percent samples positive for PCBs with a range of 1 parts per million. Only two samples were over guidelines established by FDA.

VII. INDUSTRIAL ACCIDENTS

The following isolated incidents of avoidable PCB contamination of food led to the actions described to remove the contaminated food from the market.

A. POULTRY

1. New York State Incidents. The Campbell Soup Company, Camden, New Jersey, noted in December 1970 surveillance data excessive PCB residues in chickens grown in New York State. The State of New York placed a quarantine on the three counties involved and pretesting of all feed was mandatory before slaughter.

Monitoring [illegible] PCBs in poultry fat varying from a non-detectable level to 70.0 parts per million. FDA advised the State of New York and USDA on February 4, 1971, that FDA would not object to the

distribution of poultry containing less than 5 parts per million. This level was applicable to the edible tissue on a whole tissue basis or to the separate fat removed during slaughter or processing and intended for use as a food or feed ingredient.

The regulatory control action extended from December 1970 until August 1971, when all samples submitted for testing prior to slaughter were found to be below the 5 parts per million guideline. To support this control activity and determine disposition of the fowl scheduled for slaughter the following samples were analyzed for PCBs: 1,566 dozen eggs, 198 feed, and 5,790 chicken samples. Most of the analytical work was done in the New York State chemical laboratory. On the results of these samples, 140,450 chickens were killed on the farm and buried, 75,740 chickens were passed for restricted slaughter, and 409,000 chickens were released for normal slaughter.

The alleged source of the PCBs in this incident is believed by State officials to be plastic bakery wrappers. Bakery goods were used as a feed ingredient for the poultry and the plastic wrappers which may have contained high PCB levels were ground with the bakery goods.

2. East Coast Terminal Incident (FDA Actions). The Monsanto Chemical Company informed FDA in July 1971 that large amounts of fish meal might have been contaminated with Aroclor 1242 leaking from a heating system during pasteurization of fish meal at East Coast Terminal, Wilmington, North Carolina. Aroclor 1242 was used as the heat exchange fluid. FDA inspection revealed PCB contamination of processed fish meal on hand at the firm. Investigation indicated the leak began in April 1971 and continued through July.

The fish meal on the premises was embargoed and the firm initiated a voluntary recall of fish meal processed since April 1971. An estimated 12,000 tons were distributed. Over 2,000 tons were recalled. Individual fish meal samples examined contained from 14 to 30 parts per million PCB.

FDA also initiated follow-up sampling of fish feeds, catfish from fish farms, and eggs when the contaminated fish meal was implicated. USDA was informed when investigation indicated eggs were being distributed to commercial egg breakers. As of September 1971, 224 samples of eggs had been analyzed with 71 containing residues in excess of 0.5 parts per million.

FDA seized 3 lots of eggs. The samples representing these lots contained from 0.7 to 1.9 parts per million PCB.

FDA seized 5 shipments of fish feeds that were manufactured from contaminated fish meal. These seizures were in the States of Louisiana, Georgia, and Mississippi, and were on feeds that contained from 0.6 to 4.5 parts per million PCB. In addition, a shipment of the contaminated fish meal from East Coast Terminal that had not been recalled was seized. The analysis of this seized product showed levels in excess of 350 parts per million PCB. Catfish sampled from commercial fish farms contained less than 3.0 parts per million PCB

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3. East Coast Terminal Incident (USDA Actions). The Meat and Poultry Inspection Program, USDA, was notified by Holly Farms, Wilkesboro, North Carolina (July 1971) that poor catchability had alerted them to a problem in their poultry operation. The cause was PCBs in the poultry ration. The contaminated feed ingredient was the fish meal from one supplier in North Carolina. The USDA objective surveillance program had recent reports of PCBs in poultry fat from the southeastern United States

The Food and Drug Administration informed USDA of the confirmed PCB contamination problem on July 19, 1971. The 5 parts per million guideline for poultry was reaffirmed.

The list of primary consignees, received from FDA, showed the contaminated fish meal had been distributed throughout 10 southeastern States.

USDA required all poultry coming to market from this area to be either pretested or tested after slaughter before marketing. This program is continuing with owner's certification now being accepted since the source and feed distribution channels have been identified.

The Poultry Division examined 900 lots of broken eggs, and 123,750 lbs. of product were removed from the market. The Meat and Poultry Inspection Program has examined samples from over 5,174 flocks of broilers, fowl, and turkeys during this time. One producer had to destroy over 88,000 broilers.

The present trend in PCB levels is downward, and the contamination is subsiding. Therefore, an effort is being made by USDA to test all remaining flocks that were exposed to the contaminated feed so that the pretesting requirement can be discontinued. Any chicken or turkey flocks identified as having violative levels of PCBs by this final testing program will remain under surveillance until dispoeed of by slaughter.

4. Minnesota Incident. USDA notified FDA in August 1971 that USDA and Swift and Company had found excessive PCB levels in turkeys.

Investigation indicated that the PCB residues found in the turkeys were caused by the feed. In addition, it appeared that the fat used as an ingredient of the turkey feed was the source of the PCB. The suspect fat used by the feed mill was received from a processor in Minnesota. It was found that the fat being manufactured at that time contained negligible levels of PCB. The source of the PCB levels found in the turkeys was not established.

USDA surveyed turkey flocks for PCBs in the immediate geographic area, which included parts of Minnesota, North Dakota, and South Dakota. There were 140 flocks tested, and no residues of PCBs were found above 2 parts per million (fat basis) except in the original grower's flocks, where PCBs were present at levels up to 20 parts per million (fat basis).

This one grower has been required to pretest all flocks prior to slaughter. Today the PCB level (fat basis) is approximately 1 part pe-

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million. Approximately 1 million turkeys approaching market weight were withheld from market until residue levels were reduced to less than 5 parts per million.

5. Oklahoma Incident. On August 20, 1971, USDA informed FDA of excessive PCB findings in chickens in Mississippi during routine sampling. Investigation revealed that the birds came from a grower in Oklahoma and the feed from a mill also in Oklahoma. FDA analysis of eggs and feeds from these firms showed no PCBs.

6. California Incident. USDA examined turkeys after slaughter in warehouse storage in California. PCBs were found in the amount of 1.41 to 28.0 parts per million in the fat tissue. There were 100,000 pounds of turkeys detained until testing was completed. The turkeys had originated from flocks raised in four counties in California. The source of the PCBs could not be determined.

B. MEAT BY-PRODUCTS

National By-Products, Inc., Mason City, Illinois Incident - On July 28, 1971, FDA inspection of this firm revealed that PCBs were used in heat treatment equipment. Sampling showed the pasteurized meat meal to contain PCBs. The firm initiated recall of the contaminated product.

C. MILK

1. West Virginia Incident. In July 1969, FDA's Baltimore District found PCBs in milk samples collected in the routine food surveillance program. Baltimore District investigated possible routes of contamination, and by February 1970, the investigation pointed to spent transformer fluid used as a vehicle for herbicide sprayed along power right-of-ways in the Martinsburg, West Virginia area. Through this route, PCBs contaminated dairy cattle grazing areas. The dairy farms involved were taken off production by State officials.

2. Ohio Incident. In April 1970, the State of Ohio notified FDA's Cincinnati District of unidentifiable residues in milk. FDA identified the residues as PCBs and advised the State of a guideline of 0.2 parts per million (whole milk). The State of Ohio and FDA investigated the problem and determined that the dairy farms were using a PCB-containing sealant in silos that migrated to the silage. The State of Ohio banned milk from some producers and destroyed an undetermined amount of milk.

3. Florida-Georgia Incidents. The States of Florida and Georgia reported findings of PCBs in milk to FDA's Atlanta District in August 1970. A PCB-containing sealant in silos was found to be the source of contamination in this incident. FDA found approximately 11 percent PCB in the silo coating.

VIII. PAPER FOOD PACKAGING

FDA first learned of the PCB food packaging problem in July 1971. The total diet market basket samples showed low level PCB residue in a grain and cereal composite (Table 3). The PCB was traced to the Shredded Wheat '

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TABLE 3 - SUMMARY OF PCB FINDINGS IN FDA TOTAL DIET SAMPLES

		FY 1970		FY 1971		1/2 FY 1972	
		30 Market Baskets 360 Composites		30 Market Baskets 360 Composites		15 Market Baskets 180 Composites	
	Food Class Composites	Positive	Range (PPM)	Positive	Range (PPM)	Positive	Range (PPM)
I	Dairy Products	1	T [a]	-	-	1	T
II	Meat, Fish, Poultry	3	0.02-0.03	14	T-0.15	9	T-0.08
III	Grain and Cereal Products	- [b]	-	4	T-0.36	15	T-0.10
IV	Potatoes	-	-	-	-	1	T
V	Leafy Vegetables	-	-	-	-	-	-
VI	Legume Vegetables	-	-	-	-	-	-
VII	Root Vegetables	-	-	-	-	-	-
VIII	Garden Fruits	-	-	-	-	1	T
IX	Fruits	-	-	-	-	-	-
X	Oils, Fats & Shortening	-	-	-	-	2	T
XI	Sugar & Adjuncts	1	0.08	-	-	2	T
XII	Beverages	-	-	-	-	-	-
TOTALS		5		18		31	

a. Trace (generally less than 0.05 ppm PCB)
b. None detected

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packaging material was identified as the source of PCB in the food. The manufacturer of the packaging material used about 95 percent recycled paper to manufacture paperboard containers. FDA analysis of different types of the firm's paperboard showed PCB levels ranging from about 2 to 433 parts per million. Various types of packaged food products, some of which used this firm's paperboard, were also analyzed as part of FDA's investigation. Nine samples of the 28 packaged foods examined contained PCBs in the food portion.

As a result of this limited investigation, FDA initiated a nationwide survey in September 1971, to determine the extent of the PCB food packaging problem. The survey included analysis for PCBs in all paper packaging components and the packaged food portions of 15 different representative food categories. This survey was completed in late December 1971. A detailed statistical analysis of the results of the survey is currently being compiled. Sixty-seven percent of the packaging portion of the samples contained PCB residues as high as 338 parts per million; 19 percent of the food portions of the samples contained PCB residues, with an average PCB concentration of 0.1 parts per million. The maximum PCB level found in food was 5 parts per million.

The FDA survey, as well as other studies by the paper and food industries, show a significant correlation between the presence of PCB residues in the food component and the packaging component. The mechanism of PCB migration from the packaging to the food probably occurs through both the vapor phase and abrasion or physical contact. The level of PCB contamination is dependent upon many factors -- levels of PCBs in the packaging materials, type of food, length and conditions of storage, and others. The extent of migration of PCB from paperboard packaging to the food contents is being investigated (Trout, 5). There is also significant correlation between the presence of PCB residues in packaging and the presence of recycled paper components in the packaging. The occurrence of PCBs in recycled paper materials is attributed primarily to the recycling of the so-called "carbonless" carbon paper (contains 3-5 percent PCB -- use of PCBs for this purpose has been discontinued) and to a lesser degree, the use of certain printing inks. PCB residues also were found in some packaging components that appeared to be composed entirely of virgin paper material. This source of PCBs probably occurs in the packaging manufacturing processes.

Industry has taken steps to reduce the levels of PCBs in food packaging materials by avoiding the recycling of carbonless carbon paper. Although it is not know if this practice has been instituted industry wide, data provided by the Grocery Manufacturers of America, Inc., does reflect a change. For example: recycled board manufactured during the period June 1971 - January 1972 shows that only 18 percent of the samples contained less than 5 parts per million PCB; the same type of recycled board manufactured from November 1971 through January 1972 shows that 95 percent of the samples to be below 5 parts per million PCB.

IX. SPECIAL SURVEYS

FDA is currently conducting a national survey to determine the extent and levels to which complete animal feeds are contaminated with PCBs.

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The survey covers feeds for cattle, sheep, swine, chickens, turkeys, and other miscellaneous animals. The survey results available to date show that less than 5 percent of the complete animal feeds sampled contain PCBs. Levels range from non-detectable (less than 0.1 parts per million) to a maximum level of 0.6 parts per million PCB.

Another investigation survey was recently initiated by FDA to survey the milk supply on a State by State basis to determine the extent of PCB contamination of milk intended for bottling and manufacturing use. Results from this survey are not available at this time.

The results of tissue sample studies of several domestic animals and poultry are shown in Table 4.

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TABLE 4 - OBJECTIVE SAMPLES - CY 1971
for PCB's

SUMMARY
PPM - fat Basis

ANIMAL AND POULTRY TISSUE CY 1971

Class	N.O.	.01-.1	.11-.30	.31-1.5	1.51-3.0	3.01-5.0	5.01-7.01	7.01-15	Over .5
Animals	2379	1	9	11	4				
Poultry	1664	4	25	53	23	4	5	15	11

PCB RESIDUES IN ANIMAL AND POULTRY
TISSUES COLLECTED IN OBJECTIVE PHASE
DURING CY 1971

Animal or Poultry	Number of Samples Analyzed	Number of Samples with A Residue	Percent of Samples with A Residue	Number of Samples Exceeding Guidelines	Percent of Samples Exceeding Guidelines
Cattle	722	9	1.2	0	0.0
Calves	66	4	6.1	0	0.0
Swine	436	7	0.5	0	0.0
Sheep	180	5	2.8	0	0.0
Young Chickens	637	127	7.8	2	0.1
Mature Chickens	69	5	7.2	0	0.0
Turkeys	88	8	9.0	0	0.0
Ducks	10	0	0.0	0	0.0
	4208	165	3.9	2	0.04

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FOOTNOTES

1. Jensen, S. (1966). New Scientist 32, 612.

2. Widmark, G. (1967). J. AOAC 50. 1069.

3. Armour, J. A. and Burke, J. A. (1970). J. AOAC 53, 762-768.

4. Duggan, R. E. and Cook, H. R. (1971). Pesticide Monitoring Journal 5, 37-43.

5. Trout, P. E. (1971). Grocery Manufacturers of America 'PCB Workshop', November 17, 1971.

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APPENDIX F

Human Directed Aspects of PCBs

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APPENDIX F

Human Directed Aspects of PCBs

I. INTRODUCTION

The salient aspects dealing with the chemistry and toxicology of the polychlorinated biphenyls have been summarized previously in a number of Status Reports of the FDA (Kolbye, 1; Burke and Fitzhugh, 2; Cook, 3). Additional literature reviews have stressed the chemical and biological aspects of the PCBs (Peakall and Lincer, 4; National Swedish Environment Protection Board, 5; Reynolds, 6; Zitko and Choi, 7; and Fishbein, 8).

The major objectives of this report are to review the current status of the toxicologic (acute and chronic), carcinogenic, teratogenic, mutagenic, metabolic, biological, and epidemiological aspects of the PCBs that are of greatest relevance to man and, based on the above, to cite areas of suggested future research that will more definitively relate to the human aspects of the PCBs.

II. TOXICOLOGICAL ASPECTS

A. HUMAN EPISODES

Compared to the chlorinated hydrocarbon pesticides, definitive aspects of acute, sub-acute and chronic toxicity still remain rather poorly known. Chloracnegen effects were reported as early as 1936, following industrial exposure to the PCBs,(Schwartz, 9, 10, 11; Jones and Alden, 12; Meigs, et al., 13). Occupational chloracne, however, has not been a problem with recent usage of the PCBs. Approximately 10 cases of fatal intoxication involving persons who handled or were exposed to chlorinated biphenyls or naphthalenes in their occupations have been described (Flinn and Jarvik, 14; Greenburg, et al., 15; and Drinker, et al., 16). In all cases histological examination revealed liver fatty degeneration, necroses and cirrhosis. It is important to note that chlorinated naphthalene (as well as chlorinated dibenzofurans) have been recently identified in two commercial polychlorinated biphenyl samples (Phenoclor DP 6 and Clophen A60),(Vos, et al., 17).

Human intoxication with the heat exchanger Kanachlor 400, a Japanese manufactured PCB with 48 percent chlorine and containing as its main components, 2,4,3', 4'-, 2,5,3', 4'-, 2,3,4,4'- and 3,4,3',4'-tetrachlorobiphenyl, and 2,3,4,3', 4'-pentachlorobiphenyl,(Saeki, et al., 18), was reported in Western Japan in 1968.

More than 600 people were eventually affected following the consumption of contaminated rice oil containing levels estimated to range from 2,000 to 3,000 parts per million PCBs (average of about 2,000 parts per million). These levels were derived from the known organic chlorine content of the rice oil related to the known organic chlorine content of Kanachlor 400. Exposure levels to the oil were calculated to approximate 15,000 milligrams per day. The lowest reported figures allow an estimate of a minimal positive effect level at 3 milligrams PCB per day over several months. However, the average doses associated with significant disease in the "Yusho" incident were much higher and were in the range of 30 milligrams/day. (Kolbye, 1).

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The clinical aspects associated with "Yusho" included: chloracne, blindness, systemic gastrointestinal symptoms with jaundice, edema and abdominal pain. Chloracne is very persistent with some patients showing evidence of it after three years. Table 1 lists the subjective symptoms of 89 male and 100 female Yusho patients.

New-born infants born from poisoned mothers had skin discoloration due to the presence of PCB via placental passage. (The dark skin discoloration regressed after a period of 2-5 months). Gingival hyperplasia with pigmentation was seen in several cases. Decreased birth weights were also noted but no evidence could be obtained in regard to the possible retardation in physical and mental activities of the babies (Yamaguchi, et al., 19). The skin of stillborn infants showed hyperkeratosis and atrophy of the epidermis and cystic dilation of the hair follicles. Residues of PCB have been found in fetal tissue (Kojima et al., 20 ; Inagami et al., 21).

The components of Kaneclor 400 with longer retention times have been detected in sputa and fatty tissues of patients (Kojima, 22). Serum triglyceride levels were higher than 300 mg/ml in 60 out of 396 subjects investigated before the end of 1969 (Uzawa et al., 23, 24). Among the incidence of hyperglyceridemia (triglyceride>300 mg/ml) of the six decade groups (age 0-9, 10-19, 20-29, 30-39, 40-49, 50-), that of the first decade group was the highest while that of the third decade was the lowest. The mechanism of the hyperglyceridemia was suggested to be possibly due to an observed decrease in post-heparin lipolytic activity and impaired plasma triglyceride removal (Uzawa et al., 24). Cholesterol and phospholipid concentrations were increased while lecithincholesterol acyl transferase activity was decreased. In female patients plasma lipoprotein lipase activity was decreased (Uzawa et al., 24; Nagai et al., 25). Nearly 40 percent of the examined patients exhibited an elevated excretion of steroids with the 17-ketosteroids (androsterone, etiocholanolone and dehydroepiandrosterone) found to increase in males and to decrease in females (Nagai et al., 25).

Examination of autopsy tissues of two Yusho fatalities revealed the presence of chlorobiphenyls in all of examined organs, especially mesenterial fatty tissues, skin and bone marrow (Kikuchi, et al., 26). Kojima, et al.,(20) found PCBs with longer retention times (probably pentachloro- and higher chlorinated biphenyls) in autopsy tissues and it was assumed that their presence might have been responsible for the observed long duration of the intoxication symptoms.

B. ANIMAL TOXICITY

Early studies of acute oral, dermal and vapor exposure of the polychlorinated biphenyls have involved in many cases mixtures or compounds of undefined specifications and hence have been difficult to interpret unambiguously. Tables 2-4 describe the oral, dermal and vapor exposure toxicity involving a number of chlorinated biphenyls and the results would suggest that the toxicity of these compounds is proportional to their degree of chlorination. These investigations have primarily focused on liver damage. The toxicity of 11 Aroclors in terms of oral LD_{50} (rats) and skin MLD (rabbits) is summarized in Table 5.

a. Sublethal and acute effects: Analogously with the chlorinated hydrocarbon pesticides, the most important effects are long-range sublethal effects. The pathologic changes in various organs are summarized in Table 6 illustrating some interesting differences between mammals and birds. For example, the most

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TABLE 1.

SUBJECTIVE SYMPTOMS COMPLAINED BY YUSHO PATIENTS[a,b].

Symptom	Male %	Female %
Dark brown pigmentation of nails	83.1	75.0
Distinction of hair follicles	64.0	56.0
Increased sweating at palms	50.6	55.0
Acnelike skin eruptions	87.6	82.0
Red plaques on limbs	20.2	16.0
Itching	42.7	52.0
Pigmentation of skin	75.3	72.0
Swelling of limbs	20.2	41.0
Stiffened sole and palm	24.7	29.0
Pigmented mucous membrane	56.2	47.0
Increased eye discharge	88.8	83.0
Hyperaemia of conjunctiva	70.8	71.0
Transient visual disturbance	56.2	55.0
Jaundice	11.2	11.0
Swelling of upper eyelids	71.9	74.0
Feeling of weakness	58.4	52.0
Numbness in limbs	32.6	39.0
Fever	16.9	19.0
Hearing difficulties	18.0	19.0
Spasm of limbs	7.9	8.0
Headache	30.3	39.0
Vomiting	23.6	28.0
Diarrhea	19.1	17.0

[a]Eighty-nine male and 100 female patients diagnosed before October 31, 1968 were examined.

[b]From a report of "Yusho, A Poisoning Caused by Rice Oil Contaminated with Chlorobiphenyls", Kuratsune, M., Yoshimura, T., Matsuzaka, J. and Yamaguchi, A, Fukuoka Acta Med., 60[6] (1969) 513.

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TABLE 2.

ORAL TOXICITY OF CHLORINATED BIPHENYLS.

Chlorine %	Chlorine atoms	Animal	Dose	Effect
42	3	Guinea Pig	69 mg/animal 2 doses 1 week apart	Death in 11-29 days. Liver damage. (Miller, 1944) (53)
42	3	Rat	139 mg/animal 25 daily doses	All animals survived. Liver damages. (Miller, 1944) (53)
65	7	Rat	50 mg/animal every second day	50% dead within 35 days. Severe liver damages. (Bennett, et al, 1938).(54)

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TABLE 3.

DERMAL TOXICITY OF CHLORINATED BIPHENYLS.

Chlorine		Animal	Dose	Effect
%	atoms			
42	3	Guinea pig	34.5 mg/daily over 11 days	All animals died within 21 days. Liver damage. Miller, 1944) (53)
42	3	Rat	34.5 mg/daily over 25 days	All survived. Minor liver changes. Skin affected. (Miller, 1944) (53)
42	3	Rabbit	86 mg/day with 2-day intervals for 7 applications and 172 mg/day with 2-day intervals for 8 applications	All died between 17 and 98 days. Liver damages more pronounced than in rat or guinea pig. (Miller, 1944) (53)

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.E 4

)R EXPOSURE TOXICITY OF CHLORINATED BIPHENYLS.

)lorine atoms	Concentration mg/m3	ppm	Daily exposure time (hours)	Exposure number	Exposure period (Days)	Symptoms
3	8.6	830	7	17	24	No effect on cats, rabbits, rats and mice Poor growth in guinea pigs. (Treon, 1956) (55)
3	6.83	660	7	84	122	No effects on animals as above, Treon, 1956) (55)
5	5.4	410	7	83	121	Liver cell injury. Increased liver weight in the rat. (Treon, 1956) (55)
5	1.5	115	7	150	213	Histological changes in the liver in the rat. (Treon, 1956) (55)
7	0.57 0.93		16 8		37-134 42-143	Advancing liver damage. (Bennett, et al, 1938). (54)

striking findings in mammals are alterations to the liver, whereas fluid in the pericardial sac, kidney damage and reduced spleen are found in birds.

The FDA has conducted a subacute feeding study (lasting up to 90 days) in rats with dosage levels of 25, 75, 150, 300 and 500 parts per million of Aroclors 1254 and 1260 and including sacrifices at 5, 15, 30, 60 and 90 days (Burke and Fitzhugh, 2). Liver weight to body weight ratios increased at all levels. Dose-related increases were also found in liver aniline hydroxylase and nitroreductase activity at all levels with the magnitude of the increases approximately the same at all time levels for both Aroclors. Aroclors 1254 and 1260, in contrast to many chlorinated hydrocarbon pesticides, did not stimulate liver aliesterase activity.

(Nishizumi, 27) studied the effects on mouse and monkey liver of chlorinated biphenyls (48 percent chlorine, equivalent to three to four atoms of chlorine per molecule, with a trace (0.01 percent) naphthalenes. Groups of 30 female mice were given a dosage level of 0.2 ml rice bran oil containing 1600 parts per million or 0.5 percent PCB in olive oil by stomach tube each day for 4 to 26 weeks resulting in marked liver enlargement. (Light microscopy revealed only slight liver changes, but electron microscopy disclosed marked alterations in the liver cells.) A similar study with eight monkeys (5 cynomolgus and 3 squirrel) given chlorinated biphenyls in dosage levels of 1.4 to 16 mg/day in their diet for 40 to 48 days showed both liver cell enlargement and fatty degeneration. The major abnormality reported for the administration of chlorinated biphenyls to mice and monkeys was an increase in the smooth endoplasmic reticulum in the liver cells.

The metabolism and distribution of Aroclor 1254 in normal and carbon tetrachloride-treated Wistar strain rats have been studied by (Grant, et al., 28). Residues of Aroclor 1254 (following oral administration of a 500 mg per ml corn oil solution of Aroclor at 500 mg/kg) were found in all tissues analyzed with fat and blood having the greatest and least concentration, respectively (Table 7).

Aroclor 1254 was found to potentiate the toxicity of carbon tetrachloride in a manner similar to that reported for DDT (McLean and McLean, 1966; Cawthorne, et al., 1970). The studies (Grant, et al., 28) suggest that the liver is the main site of Aroclor 1254 metabolism since rats with carbon tetrachloride damaged livers were unable to metabolise this mixture of chlorinated biphenyls as rapidly as rats with normal livers. Aroclor 1254 significantly increased the size of the liver and also the percent lipid in the liver. The same study revealed that the components of Aroclor 1254 with the shorter GLC retention times, presumably with the lowest chlorine content (Bagley, et al., 29), were metabolized to a greater degree than those with the longer retention times. This effect is in agreement with the studies of Phenochlor DP6 fed to Japanese quail (Koeman, et al., 30).

Yoshimura and co-workers,(31) studied the effects of a single 2.0 mg/mouse dose of polychlorinated biphenyls of the KC-400 type. The concentration of PCB in the skin one day after ingestion was twice as high as that in the liver. Although tetrachlorobiphenyls were almost completely eliminated from the tissues in 3-4 weeks, small amounts of penta- and hexachlorobiphenyls were still detectable after 9-10 weeks.

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TABLE 5.
TOXICITY OF AROCLORS*.

	Aroclors										
	1221	1232	1242	1248	1260	1262	1268	4465	5442	5460	2565
Oral LD_{50} mg/Kg (rats)	3980[a]	4470[a]	8650[a]	11,000[a]	10,000[b]	11,300[b]	10,900[b]	16,000[b]	10,600[b]	19,200[c]	6,310[c]
Skin MLD mg/Kg (rabbits)	>2000[a]	>1260[a]	>794[a]	>794[a]	>1260[b]	>1260[b]		>2000[b]	>1260[b]	>7940[c]	>2000[c]
	<3169[a]	<2000[a]	<1269[a]	>1269[a]	<2000[b]	<3160[b]	>2500[c]	<3160[b]	<2000[b]		<3160

[a]Undiluted.

[b]Administered as 50% solution in corn oil.

[c]Administered as 33.3% solution in corn oil.

*FDA Status Report on the Chemistry and Toxicology of Polychlorinated Biphenyls (PCB) or Aroclors as of June 1, 1970.

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TABLE 6.

PATHOLOGIC CHANGES INDUCED BY PCBs.

Treatment	Animal	Liver	Kidney	Pericardium & Peritoneum	Other Observable Changes	References
Single oral dose of 69 mg (42% Cl)	Guinea Pig Rat Rabbit	Small droplets through lobules, slight to moderate central atrophy, focal necrosis noted in a few animals	Essentially normal	No noteworthy changes	Adrenals, spleen, & pancreas showed no noteworthy changes.	Miller, 1944 (53)
300 mg daily for 6 days (65% Cl)	Rat	Cells swollen, hyaline granules present, most died within few days.				Bennett, et al., 1938 (54)
50 mg daily for up to 6 months (65% Cl)	Rat	Enlarged (33% weight increase), large number of hyaline globules in cytoplasm. Several died during experiment.				Bennett, et al., 1948 (54)
25,50 & 100 ppm in diet for 15 days (21-68% Cl Aroclors)	Rat	Increase in weight, effect increasing with increasing chlorine content. Aroclor 1232-10%, 1242-12%, 1254-14%, 1268-24% at 50 ppm.				Street, et al 1969 (56)
100 ppm in diet 200 ppm in diet 400 ppm in diet 800 ppm in diet (Aroclor 1242)	Chicken	No effect No effect Enlarged & Mottled Damaged	 Damaged	Slight Hydropericardium Hydropericardium Hydropericardium, hydroperitoneum, Enlarged		McCune, et. al., 1962 (57)

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TABLE 6. (Cont'd.)

PATHOLOGIC CHANGES INDUCED BY PCBs.

Treatment	Animal	Liver	Kidney	Pericardium & Peritoneum	Other Observable Changes	References
200 & 400 ppm in diet for 3 weeks (42%, Aroclor	Chicken	No changes noted	Paleness at 200 ppm, extensive hemorrhage, and enlargment at 400 ppm	Increased fluid in pericardial sac at the higher concentration.	Paleness of pancreas, enlargment of adrenal and small spleen at low concentrations. At higher concentrations pale cream-colored pancreas, adrenals hemorrhagic.	Flick, et al., 1965 (58)
Various doses (54% Cl, Aroclor)	Bengalese Finch	No weight changes	Weight was 32.4% of brain weight for controls and 53.5% for those dying from PCB poisoning.	Slight weight increase, a few showed liquid in pericardial sac.		Priesst, et al., 1970 (59)
400 ppm in diet for 60 days (60% Cl[a])	Chicken	Centrolobular necrosis (compd. 1 & 2). Liver weight increased from 2.76 g/100g to 4.31g/100g (compd. 3). Fatty degeneration.	Tubular dilatation, compd. 1 & 2). Rare with compd. 3.	Hydropericardium common with compds. 1 & 2. Rare with compd. 3.	Increased porphyria, spleen small with reduction of red pulp and atrophy of white pulp (compd. 1 & 2). Spleen decreased from 0.14g/100g to 0.136g/100g (compd. 3).	Vos and Koeman, 1970 (42)

[a]Phenoclor DP 6 (compd. 1). Clophen A60 (compd. 2) and Aroclor 1260 (compd. 3) were used. Differential effects noted under compd. numbers All chickens died on compd. 1 and 2 within 60 days; only 15% mortality on compd 3.

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TABLE 7.

RESIDUES IN TISSUES OF RATS ORALLY DOSED WITH AROCLOR 1254 (500 mg/kg)*.

	Residue found (ppm, wet tissue)			
Group	1	2	3	4
Blood	1.96[a] ± 0.23[b]	0.42 ± 0.07	3.85 ± 0.46	0.25[c]
Testes	19.22 ± 0.59	4.30 ± 0.44	33.18 ± 1.35	5.62
Heart	24.16 ± 2.84	5.83 ± 0.53	62.40 ± 4.37	6.17
Spleen	29.17 ± 3.44	5.82 ± 1.17	36.60 ± 4.39	—
Kidney	31.14 ± 2.09	11.20 ± 1.76	57.38 ± 3.91	11.08
Brain	39.98 ± 5.91	4.01 ± 0.31	41.91 ± 3.30	5.96
Liver	115.66 ± 10.55	18.85 ± 1.65	796.47 ± 64.96	18.79
Liver[d]	1868.14 ± 166.63	—	6137.64 ± 556.06	—
Fat	996.16 ± 98.58	672.66 ± 155.12	900.46 ± 106.16	1149.05

[a]Mean of five values.
[b]Standard error of the mean.
[c]Single value.
[d]Ppm on a fat basis.

*Grant, D. L., Phillips, W. E. J. and Villeneuve, D. C., Bull. Env. Contam. Toxicol., 6 (1971) 102. (34)

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Street and co-workers (32) studied the effects of diets of 50 parts per million to 100 parts per million of 10 Aroclors ranging in chlorine content and 21 percent to 68 percent fed to rats for 15 days. Their effect on sleeping time induced by hexobarbital, in vitro rates of aniline hydroxylation and demethylation of p-nitroanisole, and the rate of excretion were all found to be increased with increasing chlorine content. Aroclor 1221 (50 parts per million) reduced hexobarbital sleeping time by 11 percent, whereas for Aroclor 1248 and 1268 the figures were 35 percent and 48 percent, respectively. Liver weights were also found to increase with increasing chlorine content of the Aroclors. The storage of dieldrin was decreased in relationship to the chlorine content. For example, with Aroclors containing 60 percent chlorine, or more, the storage in adipose tissue was reduced to the levels found in untreated control animals. The induction of PCBs of hepatic microsomal hydroxylating enzymes has been demonstrated in the American kestrel (Peakall and Lincer, 4), and pigeons (Risebrough, et al., 33).

Fujita, et al. (66) studied the enhancement of the liver drug-metabolizing enzyme system in the rat by several individual chlorinated biphenyls. The most potent inducer was 2,3', 4,4', 5-pentachlorobiphenyl and the effect induced with a single dose of 3,3',4,4'-tetrachlorobiphenyl was found to persist for 6 weeks.

Villeneuve, et al. (34) studied the effects of PCB administration on microsomal enzyme activity in pregnant rabbits. The no-effect level of Aroclor 1254 for enzyme induction in the pregnant rabbit is between 1.0 and 10 mg/kg body weight when administered for 28 days during gestation. Aroclor 1221 did not induce any enzyme activity in the dose, fetus or placenta, so its no-effect level must be considered higher than that for Aroclor 1254. Placental transfer was shown to occur for both Aroclor 1254 and 1221 but does not cause any changes in the biochemical or physiological parameters measured, e.g., total amount of Vitamin A stored per liver, protein levels, aniline hydroxylase enzyme activity, serum cholesterol, no effect in reproductive processes. The drug-metabolizing enzymes aniline hydroxylase and aminopyrine-n-demethylase were both induced by 10 mg/kg Aroclor 1254.

Ito and co-workers (35) found that the administration of PCBs to rabbits increases the total lipid, triglyceride, and cholesterol content of liver and decreases the total liver phospholipid content. (The concentration of serum triglycerides was abnormally increased).

Kimbrough (36) described some aspects of the toxicity of Aroclor 1254 and 1260 in Sherman strain rats. The acute oral LD_{50} for Aroclors 1254 and 1260 in adult rats was greater than 4 and 10 grams/kg, respectively. The salient features of the subacute feeding and reproduction study in both male and female rats can be summarized as follows:

1. Feeding 500 parts per million of Aroclor 1254 and 1260, respectively, to both male and female rats over a period of about 240 days resulted in less weight gain as well as lowered hematocrit.

2. Some male rats fed Aroclor 1254 at a dietary level of 100 parts per million (approximately 5 mg/kg per day) developed porphyria. Porphyria was also found in female rats fed Aroclor 1254 at the 20 parts per million level and in both male and female rats fed 100 parts per million Aroclor 1260.

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3. Liver changes found with both Aroclor 1254 and 1260 include accumulation of fat, inclusions within the liver cells and so-called margination (also found with chlorinated hydrocarbons).

4. Male rats fed Aroclor 1260 at a dietary level of 100 parts per million on up had larger and heavier livers. In the females the liver weights were not significantly increased at any of the dietary levels that were tested.

5. Adenofibrosis was found in: (a) 1/10 males and 6/10 females at the dosage level of 100 parts per million Aroclor 1254 in the diet for about 8 months; (b) in 1/10 female rats at 100 parts per million Aroclor 1260 in the diet for about 8 months; and (c) in several male rats at 1000 parts per million Aroclor 1260 in the diet for 8 months (none at 500 parts per million). The adenofibrosis consisted of fibrosis in the livers concomitent with a proliferation of cells which is considered by some to represent proliferated bile ducts.

6. Two bladder cancers in rats fed 100 parts per million of Aroclor 1260 were also found and the significance of this finding has not been fully assessed at this time.

7. A definite effect on reproduction was produced by feeding 100 parts per million of Aroclor 1254. The first breeding was performed after 76 days on the treated diets and resulted in less offspring. The offspring at weaning were smaller and the survival was decreased compared to control animals. An increase in the liver weight in the F_{2a} generation of the weanlings at a dietary level of 20 parts per million Aroclor 1254 was also found.

8. A dosage of Aroclor 1260 equivalent to 100 mg/Kg/day during the 7th and 15th days of pregnancy reduced the survival and number of young.

Curley and co-workers (37, 38) studied the distribution and storage of PCBs in body fluids and tissues of Sherman rats following: (a) a single oral dose; (b) repeated dietary intake: and (c) after discontinuance. The salient findings of this study could be summarized as follows:

(1) Following acute or chronic administration of Aroclor 1254 or 1260, residue amounts can be detected in all body tissues, fluids and excrement.

(2) Pronounced changes in the gas chromatograms or mass spectroscopic total ion current traces between the Aroclor standards and components observed in the fat and urine suggest possible metabolism or differential absorption.

(3) Rats given single oral doses of Aroclor 1254 at 1600 mg/Kg or of Aroclor 1260 at 3200 mg/Kg had essentially the same levels of residue in their tissues after 24 hours (although individual variation was high).

(4) At the same dosage level rats store more PCBs than DDT.

(5) No significant differences were apparent in the storage of PCBs by male or female rats when fed the same dietary levels with PCBs stored primarily in adipose tissues.

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(6) Toxicity of the Aroclors apparently increases with decrease in chlorine content suggesting the enhanced reactivity and/or less stability of some isomeric chlorobiphenyl in the mixture.

(7) Rats fed Aroclor 1254 at 100 parts per million for 58 days and untreated food for 71 days showed gradually increasing residues during dosage while the excretion trend was quite erratic.

(8) Aroclor 1254 administered at a dietary dosage of 1000 parts per million for 98 days resulted in deaths of 9 of 10 male rats and 8 of 10 females with deaths commencing on the 35th day. Although the survivors appeared normal, there was no weight gain after 77-84 days.

Table 8 illustrates the storage of Aroclors 1254 and 1260 in plasma and tissues after oral ingestion by stomach tube at levels of 1600 mg/Kg and 3200 mg/Kg, respectively. Table 9 depicts the distribution of PCB-derived material following 98-day exposure to a dietary level of 1000 parts per million of Aroclor 1254.

Figure 1 shows the storage (mean conc. vs. time) of PCB-derived material in tissues and plasma. Figure 2 shows the excretion of PCB and PCB (mean conc. vs. time) derived material in feces and urine.

The distribution of PCB in rats dosed with PCBs has been studied with the aid of X-ray fluorescence analysis. PCB residues were found mainly in the skin, and to a lesser degree in muscles, intestines, livers, pancreas and lungs, and the GLC patterns of PCB varied from tissue-to-tissue (Sekita et al., 39).

The intestinal absorption in the rat of a number of isomeric chlorobiphenyls has been studied by Albro and Fishbein (40). PCBs having from one to six chlorine atoms per molecule were very well absorbed and/or metabolized when the compounds were fed in a single dose between 5 and 100 mg/Kg body weight. No significant difference in excretion rates (e.g., retentions) were observed over the molecular weight range 116.5 to 289, suggesting that diffusion may not be rate-limiting for the uptake of these compounds. (When similar tests were performed using aliphatic hydrocarbons, a clear relationship between percentage excreted in the feces and molecular weight was observed). Less than 10 percent of the amount fed were excreted in the feces (over a 4-day period) indicating a high degree of absorption and/or metabolism of these compounds.

b. Long-term studies: The chronic PCB studies of Monsanto with Aroclors 1242, 1254, and 1260, e.g., two-year albino rat and beagle dog, three-year rat reproduction as well as the twenty-five week chicken, have been completed and a copy of the results sent to the FDA. As of this writing, the full report has not been evaluated. However, Dr. Elmer Wheeler of Monsanto has verbally touched on the highlights of these studies supplementing information previously reported in the FDA Status Reports of the PCBs of June, 1970, and December, 1970, as well as reported by Keplinger and co-workers (41) and discussed with the Interdepartmental PCB-Task Force at a meeting in Washington on September 15, 1971. These results can be briefly summarized as follows:

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TABLE 6

STORAGE OF AROCLORS (IN PPM) 24-HOURS AFTER ORAL INGESTION BY STOMACH TUBE

	Aroclor 1254 (dosage level - 1600 mg/kg)		Aroclor 1260 (dosage level - 3200 mg/kg)	
Plasma				
Mean		24.03		15.79
SE	±	8.08	±	0.99
Brain				
Mean		138.00		145.17
SE	±	36.41	±	23.50
Fat				
Mean		1146.9		930.0
SE	±	574.5	±	426.6
Liver				
Mean		141.20		236.1
SE	±	47.80	±	116.3
Kidney				
Mean		274.03		328.5
SE	±	30.47	±	114.9
Lung				
Mean		65.91		105.17
SE	±	29.48	±	21.13
Muscle				
Mean		80.29		37.00
SE	±	67.58	±	22.37

TABLE 9.

DISTRIBUTION OF PCB-DERIVED MATERIAL FOLLOWING 98-DAY EXPOSURE TO A DIETARY LEVEL OF 1000 PPM AROCLOR 1254.

	Males (ppm)	Females (ppm)	Males vs. Females
Plasma			
Mean	17	18	p >0.50
SE ±	6	5	
Fat			
Mean	11278	8431	p >0.50
SE ±	5742	579	
Muscle			
Mean	155	753	p >0.20
SE ±	117	721	
Lung			
Mean	78	52	p >0.50
SE ±	23	20	
Brain			
Mean	111	94	p >0.50
SE ±	14	21	
Kidney			
Mean	56	54	p >0.50
SE ±	9	24	
Liver			
Mean	155	210	p >0.20
SE ±	30	13	

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Figure 1. Storage of PCB-Derived Material in Tissues and Plasma

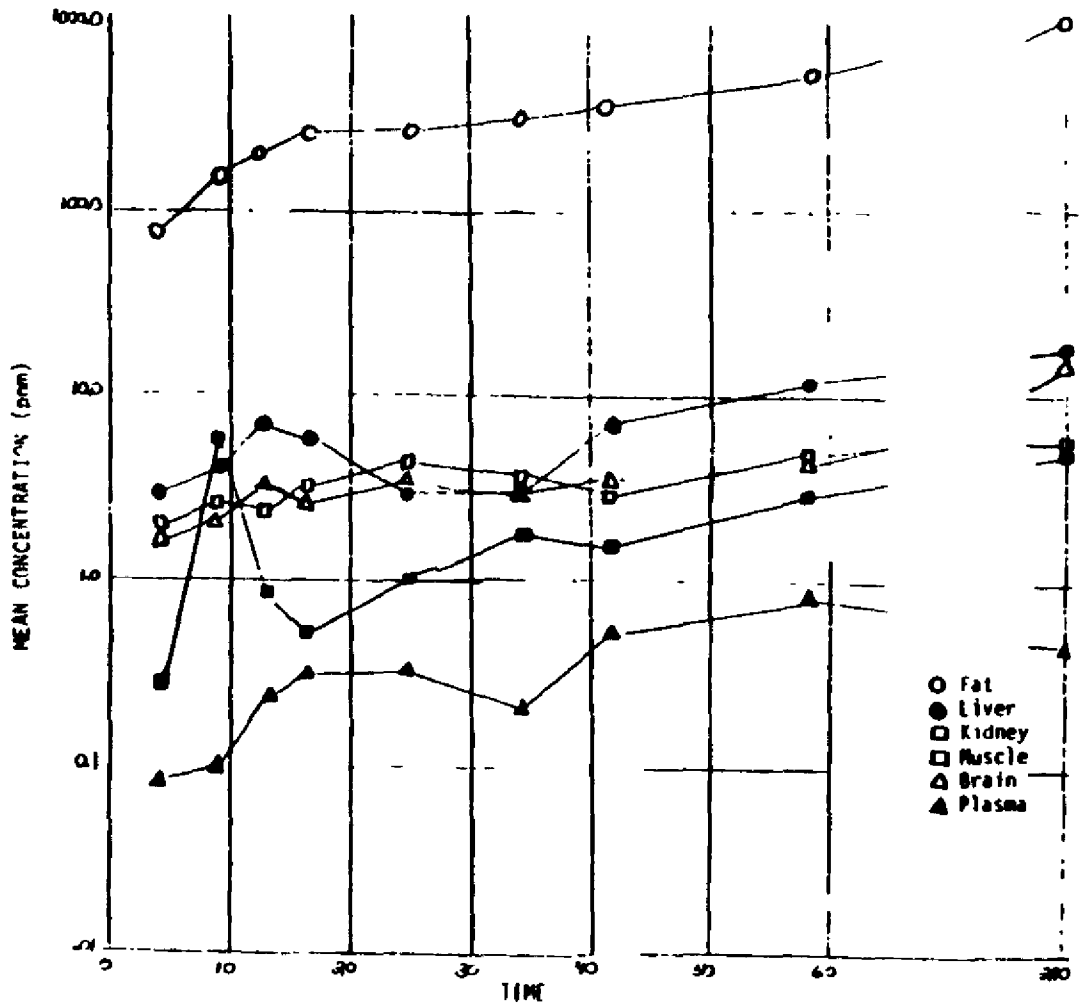

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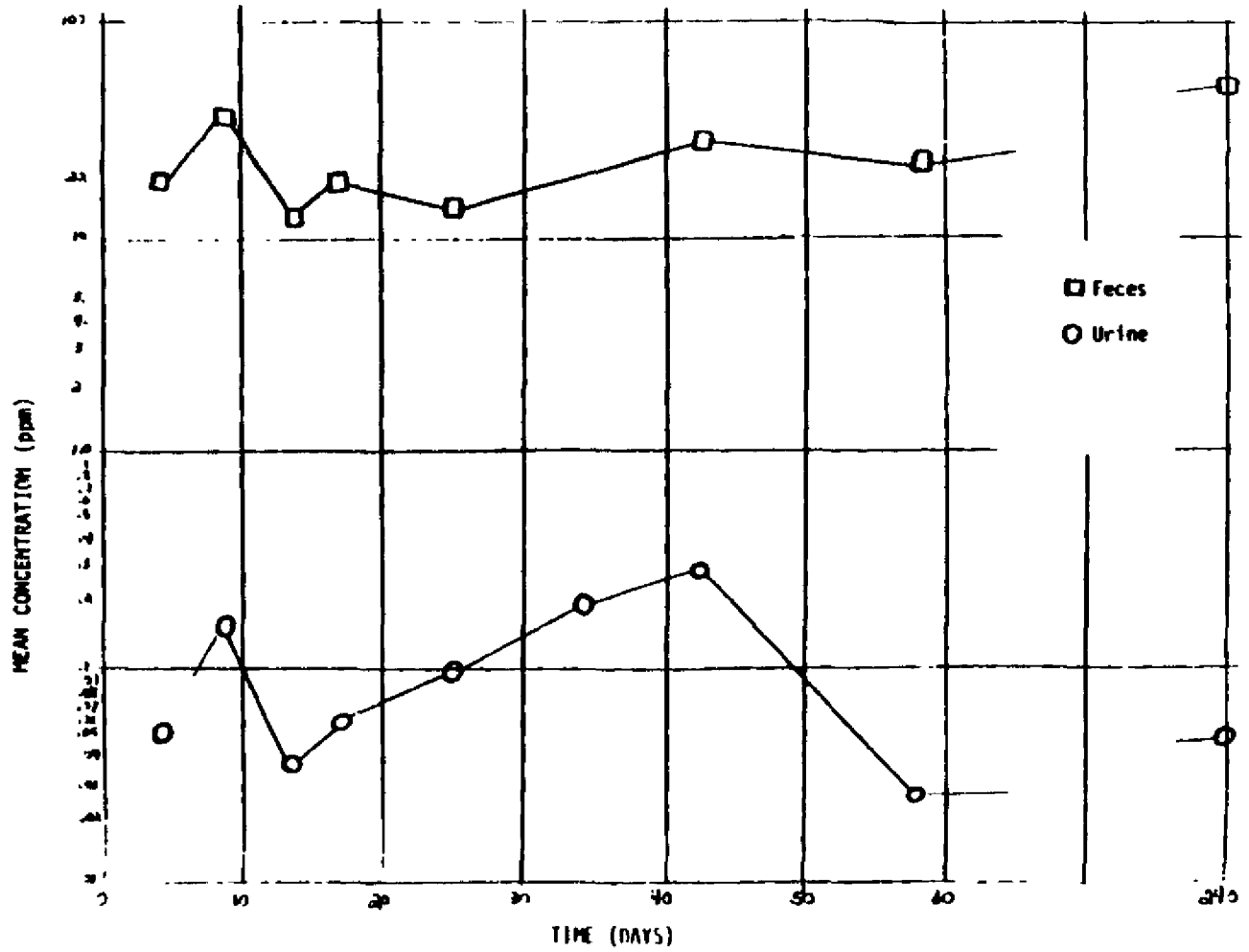
Figure 2. Excretion of PCB and PCB-Derived Material in Feces and Urine.



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(1) Aroclor 1242 is the least toxic of the Aroclors tested in two-year rat and dog studies. Aroclor 1242 was negative at 1, 10 and 100 parts per million levels.

(2) Rats fed compounds 1254 or 1260 had increased liver weights at 100 parts per million, but not at 1 or 10 parts per million with no other effects having been observed.

(3) Dogs fed 100 parts per million of 1254 or 1260 did not gain weight as well as the controls. Animals were sacrificed at 3,6 and 12 months and revealed no abnormal tissue histology.

(4) In the rat reproduction study, there was decreased survival of pups at 100 parts per million of 1242 or 1254, and decreased mating indices with 1242 at 100 parts per million were also observed. No adverse effects were found at any of the three levels of 1260 or at 1 or 10 parts per million levels of Aroclors 1242 and 1254.

In regard to the 25-week chicken study, there were no effects found following feeding with Aroclor 1260 at 1, 10 and 100 parts per million levels. There was anorexia, loss of body weight, decreased thickness of egg shells, and poor hatchability of eggs from chickens fed 10 or 100 parts per million of 1242 or 100 parts per million of 1254. There were no effects observed for Aroclor 1254 at the 1 and 10 parts per million levels. Oral feeding studies with Aroclor 1242 were repeated at the 2, 4 and 8 parts per million level and decreased hatchability was observed at 8 parts per million.

A rat teratology study of Monsanto following FDA protocol in which 35-65 mg/Kg of PCB is administered has produced no effect.

In regard to the mutagenesis study of Monsanto (Dominant Lethal Test), two dose levels of Aroclors 1242, 1254 and 1260 are being used, e.g., 500 and 1000 mg/Kg. As of the fourth week since mating, no adverse effects have been found.

It is of interest for comparison to recite the reproduction studies of the Atlanta Laboratories of the FDA (FDA Status Report, December, 1970). Weanling male and female rats were fed diets containing Aroclor 1254 at dosage levels of 0, 100 or 500 parts per million for 67 days and then pair-mated. The rats fed 100 parts per million were comparable with the controls in numbers of litters and pups per litter. However, 76.8 percent of the pups in the 100 parts per million group survived to weaning compared with 95.5 percent of the controls. The mean body weight of the 100 parts per million group at weaning was 31.4 gm and that of the controls was 39.2 gm. Only two of ten females fed 500 parts per million of Aroclor 1254 had litters (1 and 7 pups, respectively), and those pups died within 3 days after birth. In a similar study with Aroclor 1260 no difference in reproduction was found between the controls and the 100 parts per million group.

C. CONTAMINANTS IN POLYCHLORINATED BIPHENYLS

(Vos and Koeman, 42) reported a significant difference in toxicity between three commercial PCB preparations (Clophen A60, Phenoclor DP6 and Aroclor 12[illegible] despite the marked resemblance of the gas chromatograms and the mass spectra

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(Koeman et al., 30). One hundred precent mortality, centrolobular liver necrosis and abdominal edema were found only in chicks fed the samples of Clophen A60 and Phenoclor DP6. Hydropericardium was recorded in nearly all chicks fed these PCBs and only rarely seen in chicks fed with Aroclor 1260. Porphoryia was found as a general PCB effect in chicks as well as in Japanese quail and rats (Vos and Koeman, 42).

A subsequent study by Vos and co-workers (17) revealed the presence of tetra- and pentachlorodibenzofuran as well as hexachloronaphthalene in Phenoclor DP6 and Clophen A60, but not in the Aroclor 1260 sample. Since hydropericardium occurred occasionally in chicks fed Aroclor (Flick, et al.,43). Vos and co-workers (17) felt that this could possibly be indicative of small quantities of a toxic factor in this preparation.

Dermal toxicity studies in rabbits of technical PCB samples which contain an average of 60 percent chlorine (Phenoclor DP6, Clophen A60 and Aroclor 1260) as well as fractions containing tetra- and pentachlorodibenzofuran have been recently described by Vos and Beems (44). PCB-induced skin lesions were hyperplasia and hyperkeratosis of the epidermal and follicular epithelium following application of 118 mg of the three PCBs (5 times per week for 38 days) in the back skin of adult female New Zealand rabbits. Histopathology of the liver included centrolobular degeneration, centrolobular liver cell atrophy, focal necrosis and cytoplasmic hyalin degeneration. PCB-induced kidney lesions were hydropic degeneration of the convoluted tubules and tubular dilatation with the presence of casts. Definitive hyperplasia and hyperkeratosis of the follicular epithelium of the ear skin were seen after the topical application of fractions of Phenoclor and Clophen (eluted from chromatographic columns with 25 percent diethyl ether in hexane) while the fraction from Aroclor caused a minimal hyperplasia and hyperkeratosis of the follicular epithelium. Other effects elicited by the dermal application of the PCBs included thymus atrophy and lymphopenia as well as elevated excretion of fecal coproporphyria and protoporphyria.

From the response of the back skin and the liver of the rabbit to the three PCB mixtures, and from the response of the ear to the 25 percent diethyl ether-hexane fractions, it was concluded that there were definite quantitative differences in toxicity, at least between the samples that were used in the above study (Vos and Beems, 44) and the prior studies (Vos et al., 17). The extent to which these samples are representative of the normal commercial output has not been established and emphasizes the difficulty in the evaluation of toxicity data of PCBs in which the samples may differ in the amount and nature of toxic impurities.

Vos and Beems (44) also raised the possibility that since PCB is a porphyrogenic chemical, it is possible that the skin lesions in man due to PCB may be due to a combination of chloracne and acquired porphyria cutanea tarda.

It is important to additionally stress the toxic nature of the polychlorodibenzofurans. For example, tri- and tetrachlorodibenzofuran in a single oral dose of 0.5 - 1.0 mg/Kg caused severe and often lethal liver necrosis in rabbits (Bauer et al., 45). The related compound 2,3,7,8-tetrachlorodibenzo-p-dioxin

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(which has been identified as a contaminant in 2,4,5-trichlorophenol and 2,4,5-T) caused a lethal liver necrosis in the rabbit after a single oral dose of 0.05 - 0.1 mg/Kg, and when applied to the ear again in a dose 10 times lower than that found to be effective in the case of chlorinated dibenzofuran, resulted in chloracne. Vos and co-workers (44) calculated a maximum dose/egg of 0.2 ug pentachlorodibenzofuran (obtained from Clophen A60) that caused 100 percent embryonic mortality when injected into the air cell of chicken eggs. (The analogous effect was obtained with 0.05 ug hexachlorodibenzo-p-dioxin.) (Higginbotham et al., 60). The relationship between the toxic nature of PCB and the chick edema factor 1,2,3, 7,8,9-hexachlorodibenzo-p-dioxin has been described by Flick and co-workers (58).

III. EPIDEMIOLOGICAL ASPECTS

Finklea and co-workers (46) compared both polychlorinated biphenyl and chlorinated hydrocarbon pesticide residues in 723 plasma samples collected from healthy volunteers (not occupationally exposed to pesticides) who resided in Charleston County, South Carolina. PCB residues were found in 43 percent of the samples ranging up to 29 parts per billion. DDD and dieldrin residues were found in 84 and 63 percent of the people, respectively, and p,p'-DDT and DDE residues were almost universal. PCB residues were intermediate in concentration (e.g., less than half those of p,p'-DDT and DDE but six or seven times those of o,p'-DDT, DDD and dieldrin). Maximum levels of PCB, p,p'-DDT and DDE were similar, exceeding such values for the other tested residues. The prevalence of PCB residues varied remarkably over race-residence groupings, being greatest in urban residents and rural whites. PCB residues were rare (4.1 percent) in rural blacks. Rural blacks had an arithmetic mean of 0.3 parts per billion, urban blacks, 1.9 parts per billion, urban whites 2.3 parts per billion and rural whites 3.1 parts per billion, respectively. Urban exposure to the PCBs was suggested to be via polluted air and contaminated water. (PCBs in suspended particulates have already been found).

Aspects of the determination of PCBs in the adipose of the general population of the U.S.A. to date have been summarized by Dr. Yobs in a preliminary report in the Human Monitoring Survey (originally established by the Pesticides Program of the DHEW, now Division of Pesticide Community Studies, EPA).

Table 10 depicts the preliminary summary of distribution of PCB levels in adipose tissue of general population (as analyzed by three laboratories) in the analysis of Human Monitoring Survey samples since April 15, 1971. A total of 668 samples were analyzed of which 235 (34.2 percent) were negative for PCBs and 453 (65.8 percent) were positive for measurable amount of PCBs by TLC; of these 229 (33.3 percent) contained trace to <1.0 parts per million and 188 (27.3 percent) contained ≥ 2.0 parts per million PCBs. The Aroclor formulation most frequently encountered is 1254 with Aroclor 1260 also well represented in human tissues (Enos, 47). (Aliquots of all samples in which measurable amounts of PCBs were found will be analyzed by mass spectroscopy at the Perrine Primate Laboratory for future confirmation). The correlation of PCB information in this study with age, sex, geographic distribution or diagnoses has not yet been completed.

These samples were collected in late 1968 and 1969 and the sties of the positive samples were located in the following states: Michigan, New York, Minnesota, California, Massachusetts, Georgia, Kentucky, Illinois, North Carolina, South Dakota, Ohio, Louisiana, Delaware and Arkansas.

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TABLE 10.

DISTRIBUTION OF PCB LEVELS IN ADIPOSE OF GENERAL POPULATION AS SHOWN IN ANALYSIS OF HUMAN MONITORING SURVEY SAMPLES SINCE APRIL 15, 1971.

(parts per million, wet tissue basis)

	Michigan		Florida		Colorado		Total	
	No.	%	No.	%	No.	%	No.	%
Samples Analyzed	144	100	274	100	270	100	688	100
PCB Levels Negative	12	8.3	181	66.0*	42	15.6	235	34.2
Trace—<1.0 ppm	64	44.4	44	16.0*	121	44.8	229	33.3
1.0 - 2.0 ppm	55	38.2	40	14.6	93	34.4	188	27.3
>2.0 ppm	13	9.0	9	3.3	14	5.2	36	5.2

*Actual decimal reading .05.

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Dr. G. J. Love (61) of EPA has reported that 72 sets of specimens (blood, urine, and hair) collected from 36 workers occupationally exposed to burning automobiles or refuse dumps and from an equal number of controls are to be collected and analyzed for PCB levels.

It is of interest to note the analysis of PCB in human adipose tissue. Biros and co-workers (48) examined two human adipose tissue samples by combined GLC-mass spectrometry and found substantial quantities of PCBs ranging from pentachlorobiphenyl to decachlorobipheryl and including at least 14 isomers and chlorine homologs. The samples were estimated to contain 200 parts per million and 600 parts per million total PCB, respectively, as determined by electron-capture gas chromatography.

IV. STUDIES IN PROGRESS

Curley and co-workers (37) have described results in a study with Aroclor 1254 to determine placental transfer, rates of excretion in milk and consequent tissue distribution and storage levels in fetuses and weanling rats following oral dosage to the mother daily on the 7th through the 15th day of gestation at 10 mg/Kg, respectively, by stomach tube. Table 11 lists the experimental protocol for the above studies. This is summarized as follows:

Fetus Analysis: Samples were taken by Caesarian section on the 20th day of pregnancy. The mean concentrations of Aroclor are given for the respective dosages as parts per million.

	Controls	10 mg/Kg	50 mg/Kg
Mother 1	0	1.42	2.42
Mother 2	0	1.24	2.90
Mother 3	0	1.14	2.93

10 mg/Kg

	Wt. at onset (gms)	Age (days)
Mother 1	254	90
Mother 2	265	90
Mother 3	258	90

50 mg/Kg

Mother 1	242	90
Mother 2	244	90
Mother 3	261	90

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Tissue Analysis: Samples were taken from 21-day-old male and female weanling rats. The concentrations in the tissues for three animals are given in ppm.

	Controls		10 mg/Kg		50 mg/Kg	
	Males	Females	Males	Females	Males	Females
Liver	<0.05	<0.05	4.06	2.85	17.36	21.63
			3.28	8.28	25.56	12.02
			2.70	4.11	11.80	15.99
		Mean $\bar{X}$	3.35	5.08	18.24	16.55
		S.E. ±	0.39	1.64	4.00	2.79

	Controls		10 mg/Kg		50 mg/Kg	
	Males	Females	Males	Females	Males	Females
Brain	<0.08	<0.08	1.96	1.94	10.16	10.48
			2.28	2.72	5.44	3.89
			2.24	1.24	7.47	6.75
		Mean $\bar{X}$	2.16	1.97	7.69	7.04
		S.E. ±	0.10	0.43	1.37	1.91
Kidney	<0.04	<0.04	1.52	1.54	7.53	2.41
			2.42	2.19	6.73	2.25
			1.14	2.32	6.70	4.10
		Mean $\bar{X}$	1.69	2.02	6.99	2.92
		S.E. ±	0.38	0.24	0.27	0.59

Milk Analysis: Milk samples were taken from suckling rats 11 days after the last dose to the mother. Concentrations are given in ppm.

	Controls	10 mg/Kg	50 mg/Kg
Range	0	16.48 - 24.90	45.80 - 100.29
Mean	0	20.60	66.35
S.E.		±1.59	±8.36

Ar 7-70-G4

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The results of a study with Ar 1260 show consequent tissue distribution and storage levels in weanling rats following oral dosage to the mother daily on the 7th through 15th day of gestation at 50 mg/Kg by stomach tube and is summarized as follows:

Note: One female and one male taken from each of 3 litters for analysis.

Tissue	Sex	Mean (3 animals)	±S.E.
Kidney	M	7.38	2.56
	F	5.44	1.41
Brain	M	7.53	1.04
	F	7.76	2.54
Liver	M	12.80	1.72
	F	16.13	6.75

Weights of Mothers 284, 264, and 288 gm.

Mean weight of Mothers 278 gm.

Additional residue studies completed include the following:

Experiment No.	Tissue	Mean ppm (4 animals)	±S.E.
Ar-7-70-812	Fat	778	72.4
	Liver	9.9	1.16
	Kidney	5.1	.95
	Muscle	1.22	.104
	Brain	6.96	.68
	Plasma	1.6	.311

When compared to males at the same dosage level for an equal amount of time, Student's t-test shows significant difference in brain and liver storage. When these data are compared to data from male rats on the same dosage for an equal amount of time, the Student's t-test shows significant differences for brain and liver storage.

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Experiment No.	Tissue	Mean ppm (3 animals)	±S.E.
Ar-7-70-812	Fat	1022	127
	Liver	14.6	0.69
	Kidney	2.8	0.21
	Muscle	1.2	0.11
	Brain	9.3	0.57
	Plasma	2.1	0.43

When these data are compared with 8 mo. study test for significant difference shows $p < 0.05$ for liver only.

Experiment No.	Tissue	Mean ppm (3 animals)	±S.E.
Ar-7-70-812	Fat	820	216
	Liver	22.5	2.51
	Kidney	4.7	.24
	Muscle	2.9	.96
	Brain	11.2	1.71
	Plasma	3.0	0.78

When these data are compared with 10 mo. study t-test for significances show $p < 0.05$ for liver and kidney.

Experiment No.	Tissue	Mean ppm (4 animals)	±S.E.
Ar-7-70-810	Fat	274	48
	Liver	2.2	.10
	Muscle	.32	.06
	Kidney	.60	.05
	Brain	2.6	.50
	Plasma	.42	.06

TABLE 11.

EXPERIMENTS TO DATE NOT INCLUDED IN THE MANUSCRIPT, "POLYCHLORINATED BIPHENYLS: DISTRIBUTION AND STORAGE IN BODY FLUIDS AND TISSUES OF SHERMAN RATS" - A. CURLEY, V. W. BURSE, M. E. GRIM, R. W. JENNINGS AND R. E. LINDER. (37)

Experiment No.	No. of Rats	Sex	Age at Onset of Experiment (days)	Wt. (Gms)	Dosage/Route
Ar 7-70-B12	4 (analyzed)	F	30	224*	100 ppm in Diet for 247 days *8.1 mg/kg/day
Ar-7-70-B12	3 (analyzed)	F	30	224*	100 ppm in Diet for 300 days *8.1 mg/kg/day
Ar-7-70-B12	3 (analyzed)	F	30	224*	100 ppm in Diet for 366 days *8.1 mg/kg/day
Ar-7-70-B10	4 (analyzed)	F	30	240*	20 ppm in Diet for 280 days *1.6 mg/kg/day
Ar-8-71-8	A study to determine placental transfer, excretion in milk and consequent tissue storage in weanling rats of Aroclor 1254 when the compound is given to the mother rat during organogenesis.				
Ar 7-70-G4	The effect of Aroclor 1260 upon reproduction in female rats when the compound is given during organogenesis.				

*Average weight of group and average rate of food consumption for group.

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Mink reproductive studies are being carried out by Ringer, Johnson and Hoopingarner (49) of Michigan State University involving the initial feeding salmon containing 15 parts per million PCB or 10 parts per million each of Aroclor 1242, 1254 and 1260 was fatal to mink which appear to be extremely sensitive to PCB. Reproductive failure in ranch mink fed Coho salmon and other Great Lakes Fish (possibly containing PCB) have been reported by Aulerich, et al. (62).

Courtney and Chernoff (65) of the Perrine Primate Laboratory are studying the teratogenicity of PCBs. No effects have been observed in rats (CD-1 strain) given a variety of Aroclors at a level of 200 mg/Kg. Mixtures of PCBs and DDT have been found negative as well in the above strain of rats. Studies involving individual isomeric chlorobiphenyls as well as commercial PCB mixtures in in-bred strains of the rat will also be undertaken.

Wilson and Sharp (63) of the National Institute of Environmental Health Sciences are studying aspects of the interaction of beef brain (Na^++K^+) ATPase with the polychlorinated biphenyls. Enzyme activity was inhibited by 50 per cent in the presence of Aroclor 1221 or Aroclor 1254 at PCB concentrations in the range of 8-12 parts per million at 37. Under similar conditions 2.5×10^{-5}N (9 parts per million) DDT also inhibits the beef brain enzyme by about 50 percent. The PCB- and the DDT-sensitivity of the (Na^++K^+) ATPase are similar whether the enzyme is obtained from beef brain or from fish (blue gill) brain. On a parts per million basis a commercial preparation of 3-chlorobiphenyl is about as inhibitory as Aroclor 1221, whereas biphenyl, 4-chlorobiphenyl and 2, 4-dichlorobiphenyl were less inhibitory. The technique for exposure of the (Na^++K^+)ATPase to the Aroclor preparations was found to influence the degree of the enzyme inhibitory response. Beef brain (Na^++K^+)ATPase responsiveness to commercial PCBs has been demonstrated to simulate several aspects of enzyme responsiveness to DDT.

Young (50) of the Virginia Polytechic Institute is studying PCB levels (in faces and urine samples) of pre-adolescent girls fed diets typical of low income families. PCB levels in paper bags, marking tags, turkey fat, heavy fowls, eggs and poultry feeds are also being assessed and have been found in all but two samples with concentrations ranging from 0.063 parts per million to 4.56 parts per million.

The possibility of the PCBs exhibiting immunosuppressive effects is being further studied by Vos (51). The leucopenia, the reduced number of germinal centers in the spleens and lymph nodes, the atrophy of the cortex of the thymus (Vos and Beems, 44), and the atrophy of the white pulp and lymphoid foci found in the spleens of chicks fed PCB (Vos and Koeman, 42) are believed by Vos to be strong indications for an immunosuppressive effect. It was further suggested that the extent to which these observations are due to stress (release of gluco corticoids) would have to be elaborated.

Flamm and Clive NIEHS (52) are studying the mutagencity of a spectrum of Aroclors as well as individual isomers of polychlorinated biphenyls in L5178-Y mouse lymphoma cells heterozygous at the thymidine kinase locus ($TK^+/-$)3.

MONS 218977

Spalding NIEHS,(64) is elaborating the effect of Aroclors 1221, 1242, 1254, 1260 and 1268 as well as a number of isomeric polychlorinated biphenyls on mouse lymphoma and DDT-resistant mouse lymphoma cells.

V. SUMMARY AND CONCLUSIONS

Despite the nearly four decades of PCB use in a broad spectrum of applications, the increasing awareness of its environmental aspects as well as an increasing number of recent mammalian toxicological investigations, aspects of definitive acute, sub-acute and chronic toxicity still remain poorly known as regards man. The chemical and physical properties, e.g., the stability, complexity and heterogeneity of the material per se, the difficulty of separation and analysis as well as the non- or ill-defined nature of the material actually used or reported in many studies, have all certainly contributed in making the evaluation of toxicity and biological data difficult. Table 12 summarizes some biological and toxicological effects of the PCBs.

The above review of the current status of the toxicologic and biologic aspects of the PCBs suggests a number of future studies that hopefully should yield additional information to enable a more definitive evaluation of the risks involved in exposure to chlorinated biphenyls. A number of possible future studies are outlined in Table 13.

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TABLE 12.

SOME BIOLOGICAL AND TOXICOLOGICAL EFFECTS IN THE PCB'S.

1. Acute oral LD_{50} in mammals varies from approximately 2-10 gm/kg. (Apparent increase in mammalian toxicity with decrease in chlorine content).
2. Generally, enzyme induction increases with increase in chlorination of PCB's.
3. Induction of hepatic hydroxylating microsomal enzymes and increased estrogenic activity in the rat.
4. Enlargement of the liver and vacuolar or fatty degeneration of liver cells in rats, guinea pigs and monkeys.
5. Production of hydropericardial edema in chickens and Japanese quail.
6. Teratogenic effect in chick embryo.
7. Adverse reproductive effects in rats at levels of ca. 100 ppm in diet.
8. Possible adverse reproductive effects in mink.
9. Possible implications in aberrations in calcium metabolism and reproduction in ring doves.
10. Effects on hatchability in chickens, Japanese quail.
11. Skin, liver and kidney lesions in rabbits following dermal exposure.
12. Possible immunosuppressive effects in rabbits.
13. Chemical porphyrogenic effects in many species.
14. Chloracnegenic and hepatotoxic effects in man.
15. Hyperglyceridemic effects in man.
16. Human miscarriages, still births and transplacental transmission in abnormal pigmentation from "rice-oil disease" ("Yusho").
17. PCB residues in human adipose tissue, serum and milk.
18. Hepatoxic, chloracnegenic and porphyrogenic effects of chlorinated dibenzofuran contaminants in several species.
19. Chloracnegenic effects of chlorinated naphthalene contaminants in man.

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TABLE 13.

POSSIBLE FUTURE STUDIES INVOLVING PCB'S, THEIR INDIVIDUAL ISOMERS AND CONTAMINANTS.

1. Definitive studies on the mammalian distribution of the Aroclors, a number of key common individual isomers and their metabolites and/or degradation products in different tissues, the metabolic rate, retention times or turnover and excretion rates.

2. Elaboration of the relative toxicity of a number of the various purified isomers of PCB.

3. Elaboration of the effects of Aroclors and isomeric PCB's in mammalian reproduction studies are required because of the apparent anomalous relationship found in the pattern of chronic studies.

4. Elaboration of the teratogenicity of Aroclors and isomeric PCB's in several mammalian species at a range of dose levels.

5. Mutagenic studies involving the Aroclors and isomeric PCB's in test systems other than the Dominant Lethal (e.g., host mediated assay).

6. Elaboration of short-term toxicity effects on liver microsomal enzymes, study the influence of dilantin and hexobarbital and possible synergism and/or potentiation.

7. Study of the interaction of PCB's with other chemicals and drugs.

8. Study of the toxicity of the Aroclors and their individual isomers for different cell systems.

9. Elaboration of mammalian tissue distribution, metabolic rate and retention times of chlorinated dibenzofurans.

10. Liver function studies as well as cytogenic studies on workers in a) PCB production, b) application, e.g., packing of transformers, capacitors, c) waste disposal, and d) fishmeal processing plants.

11. Elaboration of aspects of hyperlipemia. Does it occur with low exposures and could it aggravate arteriosclerosis? Does it affect the pancreas, etc.?

12. Study of induced porphyria and clinical consequences.

MONS 218980

FOOTNOTES

1. Kolbye, A.C., Jr., Current Status of Toxicological Effects of PCBs (FDA), Sept. 1 (1971); Sept. 29 (1971).

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APPENDIX G

Biological Data On PCBs In Animals Other Than Man

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APPENDIX G

Biological Data On PCBs In Animals Other Than Man

Polychlorinated biphenyls have become ubiquitous in the world ecosystem in quantities similar to those of DDE. Their presence has caused concern and stimulated research to evaluate their role in the biosphere.

The significance of PCBs to wild animals depends upon both their lethal toxicity and their sublethal physiological effects. These are the subjects of the present paper. Coordinate knowledge of level of exposure, as shown by frequency and levels of occurrence of PCBs in the environment, is essential to complete the understanding. These are summarized elsewhere in this report.

I. TOXICITY

Outright mortality of wild animals can affect populations, particularly those of long-lived species. Measurements of direct toxicity are therefore important first steps in evaluation of a chemical. Other laboratory studies also are needed for proper interpretation of field observations. These include studies to diagnose cause of death by behavior of poisoned animals, tissue changes, and concentrations of chemical in critical tissues.

A. BIRDS

The toxicities of different PCBs to pheasants (Phasianus colchicus), mallards (Anas platyrhynchos), bobwhite quail (Colinus virginianus), and coturnix quail (Coturnix coturnix) were compared with the toxicities of DDT, dieldrin, and other insecticides (Heath, et al., 1). Tests of six PCB mixtures, containing 32 to 62 percent chlorine, showed that the toxicity increased with the percentage of chlorine. In general, toxicities were similar to those of DDE. There were some differences in sensitivity of the species. Bobwhite were most sensitive, followed in turn by pheasants, mallards, and coturnix quail. Bobwhite were 3-4 times as sensitive as coturnix. Special tests with coturnix quail showed that the toxic effects of DDE and Aroclor 1254 were additive but not synergistic.

In other studies, Aroclor 1254 was approximately as toxic as DDE to four species of blackbirds: grackles (Quiscalus quiscula), cowbirds (Molothrus ater), starlings (Sturnus vulgaris), and redwings (Agelaius phoeniceus) (Dustman, et al., 2). Redwings were somewhat more susceptible to DDE than to PCBs. Signs of poisoning were sluggishness with slight tremors of moderate amplitude, much as with chemicals of the DDT group. Internally, livers frequently had hemorrhagic streaks or spots, and the gastrointestinal tract commonly contained blackish fluid, but these signs were not sufficiently consistent for distinctive diagnosis.

Aroclor 1254 was approximately 1/13 as toxic as DDT to Bengalese finches (Lonchura striata) (Prestt, et al., 3). Tremoring and other signs were similar to those observed among blackbirds; the finches had enlarged kidneys and some had hydropericardium.

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Chicks kept in batteries recently painted with an epoxy-resin paint, (McCune et al., 4). died as a result of Aroclor 1242 in the paint. Others fed this compound developed hydropericardium and enlarged livers and kidneys.

Egg injection studies showed that Aroclor 1242 had a relatively high toxicity (McLaughlin, et al., 5).

Aroclor 1248 fed to 10-day-old chicks depressed growth rates at dietary levels of 50, 100, and 150 parts per million (Rehfeld et al., 6). Only 2-4 of 10 chicks survived each of the three higher dosages. Growth rates were reduced at 20, 30, and 40 parts per million in a second experiment; mortality was 16 of 30 birds at 50 parts per million dosage, 4 of 20 at 40 parts per million, and 1 of 30 at 30 parts per million to 5 weeks of age. Birds fed diets containing more than 20 parts per million developed general edema; those fed diets containing 40 and 50 parts per million developed noticeably smaller combs and wattles than normal. Liver weight increased as a percentage of body weight, primarily as a reflection of lower body weights.

Mortality was high among White Leghorn cockerels fed a dietary dosage of 500 parts per million of Aroclor 1254 from the day of hatching; the birds died between the third and tenth week of feeding (Platonow and Funnell, 7). At 250 parts per million birds did not die until the thirteenth week. At this dosage, weight gain was poor, livers increased in weight relative to body weight, combs and wattles were abnormally small, and testes were small. The effect on combs appeared before the effect on the testes.

Polychlorinated biphenyls supplied by three different manufacturers gave strikingly different results in toxicity tests with domestic chickens, although all formulations contained 60 percent chlorine (Vos and Koeman, 8). The PCBs were Phenoclor DP6, manufactured in France; Clophen A60, manufactured in Germany; and Aroclor 1260, manufactured in the United States. Twenty-four birds fed 400 parts per million of Phenoclor DP6 all died within 60 days; all had liver necrosis and 18 had hydropericardium. Twenty-two of 24 birds fed Clophen at the same dosage also died with liver necrosis and 20 with hydropericardium. However, none of the birds fed Aroclor died; none had liver necrosis, and only three had hydropericardium. Chickens fed all formulations developed atrophy of the spleen and excess quantities of porphyrins. These different effects of the three brand-named products were later largely explained by the identification of chlorinated dibenzofuran and chlorinated naphthalene as contaminants in Phenoclor and Clophen (Vos et al., 9).

In a further study with coturnix quail, porphyria again resulted from dosage with Aroclor 1260 that was carefully tested to insure the absence of measurable amounts of contaminants (Vos et al., 10). Males given a daily dose of 50 mg/kg of PCBs (the lowest dosage tested) developed porphyria, as did females given 100 mg/kg, although those given 10 mg/kg or less did not. The porphyria was closely associated with an increase of mitochondrial ALA synthetase.

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1. Residues in Birds Killed by PCBs. Chickens killed by PCB dosage in the studies of(Vos and Koeman, 8) generally contained from 120 to 420 parts per million in the brains, but the overall range was from 40 to 700 parts per million. Residues in livers were 120 to 2,900 parts per million.

Coturnix quail poisoned by PCBs (Phenoclor DP6) contained residues of 342-1710 (av. 1158) parts per million in the brain and 1079-8350 (av. 3280) parts per million in the liver (Koeman, 11).. Bangales finches killed by PCBs had residues of 70 to 697 parts per million in the livers; those sacrificed at the end of the experiment contained 3 to 634 parts per million (Prestt,et al., 8). Residues in brains were somewhat lower; the proportional amount in the brain in comparison with the amount in the liver averaged higher in the birds that died than in those that were sacrificed.

A bald eagle found sick in the field contained high residues of both DDE and PCBs in its brain, suggesting that PCBs may have contributed to its death. Residues of DDE in the brain were 385 parts per million, which is within the lethal range for DDE (Stickel et al., 12). However, the brain also contained 230 parts per million of PCBs, 6 parts per million of DDD, 2.2 parts per million of dieldrin, and 0.4 parts per million of heptachlor epoxide.

B. INSECTS

The toxicity of PCBs to insects also is related to the chlorine content, but in the reverse order to the result with birds. PCBs with lower amounts of chlorine were more toxic to flies than PCBs with higher chlorine content, and the toxicity of mixtures with more than 48 percent chlorine was very low (Lichtenstein et al., 11). Toxicity of dieldrin and DDT was enhanced beyond an additive effect by the addition of the lower chlorinated PCBs.

Topical applications of Aroclor 1254 to a grasshopper (Clorthippus brunneus) produced delayed mortality that occurred at the time of molt (Moriarty, 14).

C. FISH AND AQUATIC INVERTEBRATES

Shrimp (Panaeus duorarum) are sensitive to low concentrations of PCBs (Duke,et al., 15). All individuals died as a result of a 48-hour exposure to flowing seawater containing 100 parts per billion of Aroclor 1254; 80 percent died in 24 hours. These shrimp accumulated 3.9 parts per million in their tissues. Shrimp exposed to 10 parts per billion did not die, but accumulated 1.3 parts per million of PCBs in their tissues.

Seventy-two percent of the juvenile shrimp died from a 20-day exposure to 5 parts per billion of Aroclor 1254 and the tissues accumulated 16 parts per million. Crabs (Callinectes sapidus) were less sensitive, but accumulated an average of 23 parts per million in a 4-week exposure at 5 parts per billion and still contained 22 parts per million after a week in clean water and 11 parts per million after 4 weeks in clean water.

The small crustacean,(Gammarus oceanicus) had a lethal threshold in 30-day tests between 0.001 and 0.01 parts per billion in colloidal solution and betwee-

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0.01 and 0.1 parts per billion in emulsions of Aroclor 1254 solubilized in Corexit 7664 (a commercial nonionic surfactant preparation) in seawater (Wildish, 16). Gammarus that died had severely necrosed branchiae, and some animals exposed to as little as 0.001 parts per billion developed a less extensive sublethal necrosis. Moulting or freshly moulted animals were particularly vulnerable.

Shell growth of oysters stopped completely in a 96-hour exposure to 100 parts per billion of PCBs. Shell growth was reduced by 40 percent in exposure to 10 parts per billion and the oysters accumulated 33 parts per million of PCBs in their tissues (Duke, et al., 15).

Pinfish (Lagodon rhomboides) survived exposure to 10 or 100 parts per billion of Aroclor 1254 for 48 hours, but those exposed to 100 parts per billion accumulated 17 parts per million (Duke, et al., 15).

In further studies at the same laboratory, pinfish and spot (Leiostomus xanthurus) died when exposed for 14-45 days to 5 parts per billion of Aroclor 1254, but spot appeared unaffected by exposure to 1 part per billion for periods up to 56 days (Hansen, et al., 17). Onset of death in both species exposed to 5 parts per billion was delayed. Pinfish developed fungus-like lesions on the body, with some hemorrhaging. Spot usually ceased feeding, became emaciated, and developed ragged fins and lesions. Some fish that survived exposure to 5 parts per billion Aroclor 1254 became diseased and died even though they were placed in flowing water free from PCBs.

Rainbow trout (Salmo gairdneri) are very sensitive to the terphenyls (Guthrie and Acres, 18). Fifty percent of the fish exposed to Santowax OM* + 30 percent high boilers at concentrations of 10 parts per billion or greater died in 48 hours or less under normal oxygen conditions. With reduced oxygen, 50 percent died in less than 2 hours even at a concentration of 2 parts per billion (the lowest tested). The fish became hyperactive in less than 1/2 hour in water containing 25 parts per billion or more. Within 1 to 5 hours, gills reddened, swimming slowed, and balance and avoidance reactions were altered. Less than 5 percent of the fish recovered after showing these signs. HB-40* was less toxic, and less than 25 percent of the fish died within 48 hours.

II. PHYSIOLOGY

The effects of PCBs on reproduction and other physiological processes of wild animals are apt ultimately to have the most serious impact on the populations. Yet these effects are the most difficult to evaluate. Pertinent data are summarized here, with the exception of data for laboratory mammals, which are included in other sections of this report.

A. METABOLISM AND KINETICS

In Swedish waters, lower organisms such as mussels and fish contained a greater preponderance of PCBs with lower chlorination than did birds, which suggested that the compounds with fewer chlorines were metabolized or excreted

* Monsanto Chemical Company trade name. Santowax is a mixture of ortho-, meta-, and para-terphenyls. HB-40 is a mixture of hydroterphenyls and terphenyls. High boilers are tar-like decomposition products produced as a result of the exposure of terphenyls to a high radiation field.

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faster than those with more chlorines, so that the latter were subject to greater increase in the food chain (Jensen, et al., 19).

In two simple food chains, fish to eagles (Haliaeetus albicilla) and fish and mussels (Mytilus edulis) to seals (Phoca vitulina and Pusa hispida), concentrations increased hundreds to thousands of times from prey to predator (Jensen, et al., 19). Fish contained hundredths to tenths of parts per million; fresh mussels contained hundredths of parts per million; seal blubber contained 5-21 parts per million; and the muscle of the white-tailed eagle contained 150-240 parts per million.

In Great Britain, birds that feed on birds or mammals contained the highest concentrations of PCBs, those that have a mixed diet contained the next highest, and those that feed on insects had the lowest (Prestt, et al., 3). The fish-eating herons from the southeast of England contained higher residues of PCBs than birds of any other area.

Many species of California birds contained hundredths to tenths of parts per million of PCBs; peregrines (Falco peregrinus) contained greater amounts, one as high as 98 parts per million in muscle (Risebrough, et al., 20), while fish in the same area contained only thousandths of parts per million.

Residues of PCBs in the industrially polluted Escambia Bay increased in the expected order. Water contained a maximum of 275 parts per billion, and sediment a maximum of 486 parts per million. Oysters (Crassostrea virginica) contained 2-3 parts per million, shrimp (Penaeus duorarum) 1.5-2.5 parts per million, blue crabs (Callinectes sapidus) 1-7 parts per million, and pinfish 6-12 parts per million (Duke, et al., 15).

Subsequent samplings from three stations in the Bay showed little change in concentrations of PCBs in sediments even after 9 months (Nimmo, et al., 21). Experiments were then undertaken that showed that shrimps (Penaeus duorarum) and fiddler crabs (Uca minax) could accumulate Aroclor 1254 from the sediments. Relationships between concentration of PCBs in sediment and concentration in crabs and shrimps were variable. The maximum accumulation was from sandy silt containing 61 parts per million (dry weight) of Aroclor 1254; fiddler crabs accumulated 80 parts per million (wet weight) in their bodies; shrimp accumulated 240 parts per million (wet weight) in the hepatopancreas. Some PCBs were present in the water and a portion of the accumulation could have been from that source. The ratio of individual PCB isomers maintained integrity in the sediments and tissues of test animals throughout the investigation, indicating no pronounced metabolic changes of the PCBs.

Spot (Leiostomus xanthurus) exposed to 1 part per billion of Aroclor 1254 for 56 days attained maximum concentrations in 14-28 days, although absolute amounts continued to increase as the fish grew (Hansen, et al., 17). Maximum concentration in whole spot was 37,000 times that in the test water. These results were very similar to those for DDT reported earlier from the same laboratory. The PCBs were lost slowly from the tissues of spot after they were placed in clean flowing water. After 84 days of flushing, the concentration had dropped 73 percent and the absolute amount had dropped 61 percent. Isomers of Aroclor 1254, with the exception of one peak, maintained their integrity in spot.

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Marine diatoms (Cylindrotheca closterium) exposed to Aroclor 1242 at 0.01 and 0.1 part per million in culture flasks absorbed the chemical to a concentration of 4.7 and 109.2 parts per million, 470 and 1,100 times the concentrations in the surrounding medium (Keil, et al., 22). The higher concentration (0.1 part per million) sharply inhibited growth as indicated by harvest weights and cell counts and reduced RNA synthesis and the chlorophyll index but had no effect on DNA levels. No such effects were produced by the 0.01 part per million concentration. Some early eluting PCB materials not common to the known mixture of Aroclor 1242 were isolated from the diatoms, suggesting possible metabolism of the Aroclor.

A species of salt-water diatom (Thalassiosira pseudonana) grew at a significantly reduced rate when exposed to Aroclor 1254 at concentrations of 25, 50, and 100 parts per billion in the culture medium (Monser, et al., 23). Survival was reduced by exposure to 50 and 100 parts per billion. A second species (Skeletonema costatum) was more sensitive and grew somewhat more poorly when exposed to 10 parts per billion. Both species were more sensitive to PCBs than to an equivalent amount of DDT. By contrast, a marine green alga and two species of freshwater algae were not inhibited by these or higher concentrations of PCBs.

The small crustacean,(Gammarus oceanicus),appeared to absorb Aroclor 1254 across the general integument (Wildish and Zitko., 24). Uptake was not altered by removal of branchiae epi-flora and by removal of epi-fauna, or by the stage of intermoult. Rate of uptake was greater at higher concentrations and declined after a few hours. Dead Gammarus absorbed significantly smaller amounts of PCBs from the seawater than did the living animals.

PCBs inhibited ATPases in bluegills (Lepomis macrochirus). Aroclor 1254 was the most effective inhibitor, followed by Aroclor 1221 (Yap, et al., 25). Aroclor 1268 and 5460 showed less pronounced effects. Tissues (brain, kidney, liver, and muscle) also differed; muscle ATPase showed the greatest sensitivity, with a response similar to that observed for DDT.

In the Netherlands, the PCBs of lower chlorination were more common in fish (Leuciscus rutilus) than in sea birds, and it was concluded that compounds with fewer chlorines probably were metabolized or excreted relatively rapidly (Koeman, et al., 26). This hypothesis was confirmed in an experiment with Japanese quail; the gas chromatographic pattern of PCBs in the quail tissues was considerably altered from that of the fed material, and many of the peaks representing lower chlorinated compounds disappeared. There was a similar difference in pattern of the PCB compounds present in the egg of a mallard duck and the pattern of the Aroclor 1254 that the duck had eaten (Heath, 1).

PCBs increased the breakdown of estradiol in domestic pigeons (Risebrough, et al., 20) and kestrels (Falco sparverious) (Lincer and Peakall., 27). demonstrating their capability to induce microsomal enzyme activity. The PCBs were given by injection (pigeons) or ingestion (kestrels) of relatively high dosages; the birds were sacrificed and in vitro laboratory studies were made of the homogenized livers.

MONS 218991

Mallard ducklings demonstrated the possibility of interacting effects between PCBs and disease organisms (Friend and Trainer, 28). Thirty-five to 44 percent of the 10-day-old ducklings exposed for 10 days to a dietary dosage of 25, 50, or 100 parts per million of Aroclor 1254 died upon subsequent exposure to duck hepatitis virus in contrast to only 14 percent of the birds exposed only to the virus.

Swedish robins (Erithacus rubecula) given 5 micrograms of Clophen A50, for 11-13 days showed a greater migratory restlessness than controls (Ulfstrand and Södergren, 29).

Pheasant hens absorbed 94 percent of the Aroclor 1254 given as a single capsule dose, a very efficient entry of this chemical into the system (Dahlgren, et al., 30). Residues in muscle declined 82 percent in 28 days after dosage. Residue were excreted in both eggs and feces.

Residues in the milk of cattle inadvertently exposed to PCBs declined at the rate of 1.3 percent per day when uncontaminated feed was restored (Fries, et al., 31). The rate of loss of DDE residues was identical. PCBs in milk fat decreased from 12.6 parts per million to 5.8 parts per million in about 3 weeks and to 2.1 parts per million in about 4 months.

A cow given 10 mg/kg of Aroclor 1254 in a single dose released an average of 3.9 parts per million into the whole milk during the next 4 days' milking. A dosage of 100 mg/kg produced 36 parts per million in the milk of another cow (Platonow, et al., 32). The gas chromatographic pattern of the Aroclors in the milk was very similar to that of the fed compound.

B. REPRODUCTION

Pheasants given a capsule dose of 50 mg of Aroclor 1254 weekly for 17 weeks produced fewer eggs than controls, and a higher percentage of chicks pipped the shell but did not hatch (Dahlgren and Linder, 33). Chicks that hatched weighed less and survived more poorly than controls. Eggshell thickness was not affected. In behavioral tests of the offspring on a visual cliff, more of the chicks from the dosed parents made the undesirable choice of jumping to the deep side, or made no choice, in the 5-minute test period. None of these effects occurred among the groups whose female parents were dosed with 12.5 mg.

Mallards fed a dietary dosage of 25 parts per million of PCBs from about 11 weeks before their first breeding season and through their second year laid eggs with shells of normal thickness (Heath, et al., 1). The number of eggs laid, hatchability, and survival of young did not differ significantly from the untreated controls. In another test, mallard ducks fed 10 or 500 parts per million of Aroclor 1254 in the diet for about 5 weeks laid eggs with normally thick shells. Bobwhite quail fed diets containing 50 parts per million of PCBs, or 30 parts per million of DDE, or a combination of 25 parts per million of PCBs plus 15 parts per million of DDE for about 11 weeks before their first breeding season reproduced as well as controls.

Ring doves (Streptopelia risoria) fed 10 parts per million of Aroclor 1254 for 6 months laid eggs no lighter than those laid by control birds. (Peakall, 34). Fourteen birds fed 10 parts per million of PCBs before and after dosage and nine birds injected intraperitoneally with 160 mg/kg 1-4 days before egg laying confirmed the lack of effect of PCBs on shell weight.

MONS 218992

Chickens fed Aroclor 1242 at 10 parts per million or 100 parts per million and Aroclor 1254 at 100 parts per million laid fewer eggs, hatched fewer chicks, and laid eggs with thinner shells than controls in tests made for the Monsanto Chemical Company by the Industrial Bio-Test Laboratories. Those fed Aroclor 1242 at 1 part per million, Aroclor 1254 at 1 part per million or 10 parts per million, or Aroclor 1260 at 1 part per million, 10 parts per million, or 100 parts per million did not differ significantly from controls.

The studies with chickens and with ducks differed in dosage levels and in the type of PCBs employed, so that the differences cannot necessarily be ascribed to the difference in species. Further tests with ducks and with other species are needed in order to understand the potential for PCBs to affect reproduction of wild birds.

In recent studies at the Patuxent Wildlife Research Center, a statistical evaluation of the role that different chemicals may play in thinning the shells of brown pelicans in the field has shown that DDE residues correlate much better with shell thinning than do residues of dieldrin or PCBs (Blus, et al., 35; Anderson, et al., 36) reported similar results from studies of shell thinning and residue content of the eggs of cormorants and white pelicans.

Reproductive failure occurred among ranch mink that were fed fish from the Great Lakes and the Miramichi (Gilbert, 37 ; Aulerich, et al., 38). Such effects could not be produced experimentally by dosages of DDT or its metabolites in levels far in excess of those present in the fish (Aulerich, et al., 38). This led to the belief that other contaminants must be responsible, and tests have been initiated with PCBs as a possible candidate.

III. SUMMARY

Polychlorinated biphenyls have become ubiquitous in the world ecosystem in quantities similar to those of DDE.

Experimental studies have shown that PCBs have a toxicity to mallards, pheasants, bobwhite quail, coturnix quail, red-winged blackbirds, starlings, cowbirds, and grackles that is of the same order as the toxicity of DDE to these species. Overt signs of poisoning also are similar to those caused by compounds of the DDT group. Toxic effects of DDE and Aroclor 1254 to coturnix chicks were additive, but not synergistic.

PCBs containing higher percentages of chlorine are more toxic to birds than those containing lower percentages. PCBs of foreign manufacture contained contaminants to an extent that greatly increased their toxicity.

Residues of PCBs in the brains of birds killed by these compounds measure in the hundreds of parts per million. PCBs may have contributed to mortality of some birds in the field.

Toxicity to insects of PCBs of different degrees of chlorination is the reverse of the pattern in birds: the lower chlorinations are more toxic to insects. PCBs enhanced the toxicity of dieldrin and DDT to insects.

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Shrimp are very sensitive to PCBs and most will die as a result of 20-day exposure to a concentration of 5 parts per billion. PCBs also inhibit shell growth of oysters. Crabs are less sensitive; all accumulate residues to many times the concentrations in the water, and a test with crabs showed that they lost the residues very slowly.

Growth of certain species of marine diatoms was experimentally inhibited by PCBs, but algae were not affected.

The small marine crustacean, Gammarus, is sensitive to PCBs in concentrations of thousandths to tenths of a part per billion.

Exposure to 5 parts per billion of Aroclor 1254 caused mortality of two species of fish in 14-45 days. Onset of death was delayed and was accompanied by fungus-like lesions.

Rainbow trout were quickly killed by polychlorinated terphenyls at 10 parts per billion under normal oxygen conditions and at 2 parts per billion with reduced oxygen.

Metabolic changes of PCBs have been suggested by environmental observations of different isomeric patterns in animals of different trophic levels. Quantitative differences also are pronounced, with magnifications of hundreds to thousands of times.

Laboratory studies have shown no metabolic changes of PCBs by crabs and shrimps, minimal changes by fish, and pronounced changes by birds.

PCBs induce microsomal enzyme activity in birds. Exposure to PCBs increased the susceptibility of mallard ducklings to duck hepatitis virus.

Offspring of pheasants whose parents received high dosages of PCBs made poor choices in visual cliff tests. Egg production and hatching after pipping also were affected. Migratory restlessness was increased in English robins exposed to PCBs.

Long-term studies of the reproductive effects of Aroclor 1254 on mallards and bobwhite quail and of Aroclor 1254 plus DDE on quail showed no significant differences from controls. In studies of chickens, however, egg production and hatchability were impaired by high doses of Aroclor 1254 and by low doses of Aroclor 1242.

Statistical evaluations of the role that different chemicals may play in thinning eggshells of brown pelicans showed that DDE residues correlate better with shell thinning than do residues of dieldrin or PCBs, confirming observations with cormorants and white pelicans.

IV. CONCLUSIONS

PCBs are man-made biologically active substances that are dispersed throughout the environment and stored in the tissues of animals. They are lethally toxic to fish and aquatic invertebrates in concentrations measured

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in parts per billion or less. They are metabolized and excreted very slowly by these organisms.

They are only moderately toxic to birds and mammals and the lethal levels are similar to those of DDE. In sublethal exposure, they are physiologically active and induce ensyme activity. Effects on reproduction have been shown for chickens but not for ducks, quail, or doves, and for rabbits only at high dosages.

Full evaluation of their actual or potential effects in the environment is hampered by the complex nature of the mixtures that compose them, and by the inclusion of contaminants in these mixtures. Experimental studies have been conducted with the unaltered products, as sold, and the results may not properly reflect the effects of the components as they exist in the environment.

The evidence available, however, indicates that PCBs must be viewed as potential problems. The difficulties of attaining a proper evaluation in any reasonable length of time suggest that the least costly course would be to take all measures possible to prevent their escape into the environment.

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APPENDIX H

Regulatory Action on PCBs

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APPENDIX H

Regulatory Actions on PCBs

I. EXISTING REGULATORY AUTHORITY

At least ten Federal laws are potentially relevant for the regulation of PCBs. However, not all of them have actually been utilized to deal with the PCB problem. Federal Food, Drug, and Cosmetic Act (21 U.S.C. 301 et.seq.)

Section 402 of the Federal Food, Drug, and Cosmetic Act (FDC Act) defines an "adulterated food" as a food which (among other criteria):

1. Contains any poisonous or deleterious substance which may render it injurious to health; or
2. Contains any food additive unless the use of the additive conforms to exemptions or regulations issued by the Food and Drug Administration (FDA). FDA has applied both of these criteria to PCBs, depending upon the circumstances under which the PCB entered the food.

The FDC Act prohibits the introduction of adulterated food in interstate commerce; prohibits the adulteration of food while moving in interstate commerce; and prohibits the receipt of an adulterated food in interstate commerce and subsequent delivery of it for sale or otherwise when the initial recipient is aware that the food is adulterated. The Act also authorizes FDA to seize any adulterated food products which have entered interstate commerce or which become adulterated while held for sale after receipt in interstate commerce.

The FDA enforces the FDC Act by various means including inspections of food establishments (other than meat, poultry, and egg breaking plants) to determine whether the provisions of the Act are being violated. These inspections include the collection and analysis of food samples. Some of the samples are of a routine surveillance nature to determine the presence of adulterants such as pesticides which exceed tolerance levels and other contaminants such as mercury, lead, cadmium, harmful bacteria, natural poisons, etc. However, the actual number of routine surveillance samples taken is small, and effective enforcement relies heavily on information on the known or suspected existence of specific instances of food adulteration.

A. FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT (7 U.S.C. 135-135k)

Under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) all pesticides (referred to in the act as "economic poisons")

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shipped in interstate commerce must be registered with the EPA. EPA can refuse to register a product if it will cause injury to man or the environment if used according to the label. The registration of a product can be suspended or cancelled if it is found to no longer meet the criteria for registration.

On October 29, 1970, the Pesticides Regulation Division (then in the Department of Agriculture; now in EPA) issued a notice (PR Notice 70-25) to all pesticide manufacturers, formulators, and distributors. The notice stated that, "Formulators and manufacturers of economic poisons containing polychlorinated biphenyls and polychlorinated terphenyls should change their formulations to eliminate such chemicals either as active or inactive ingredients. It is believed that a period of six months is a reasonable period of time within which to affect such formula changes." Assuming that the notice has been complied with, there should be no pesticides which currently contain PCBs.

B. FEDERAL WATER POLLUTION CONTROL ACT (33 U.S.C. 466 et.seq.)

The Federal Water Pollution Control Act (FWPC Act) authorizes the Administrator of EPA to enforce State water quality standards established by the States and approved by the Federal Government if the State is not adequately enforcing the standards. No States have established water quality standards relating specifically to PCBs. Thus the water quality stancards part of the FWPC Act is not a useful tool for dealing with the PCB problem.

Section 12 of the FWPC Act applies primarily to accidential discharges of hazardous polluting substances. It requires the immediate reporting to EPA or the Coast Guard of any discharge of a hazardous substance from a vessel or an onshore or off-shore facility. The discharger is responsible for making the report and for clean-up, but EPA is authorized to remove or arrange for the removal of the hazardous substance if the discharger is unable or unwilling to do so. PCBs are being designated as hazardous substances under section 12, and the authority contained in the section could be used if an accidental spill of PCBs into water should occur.

C. THE REFUSE ACT OF 1899 (33 U.S.C. 407)

Another legal authority for controlling water pollution is section 13 of the 1899 Refuse Act which forbids discharge of any wastes (other than municipal wastes) into navigable waters without a permit, issued by the Army Corps of Engineers, which can limit the discharge of substances into water. EPA and the Justice Department are prepared to use the Refuse Act to prevent PCB discharges.

D. THE CLEAN AIR ACT (42 U.S.C. 1857 et. seq.)

The general authorities contained in the Clean Air Act are not, for the most part, applicable to PCBs because PCBs are not generally emitted into the air in the normal operations of a municipal or industrial facility. PCBs may become air contaminants through the burning of refuse, but such emissions usually could be controlled only by preventing the substance from initially getting into the refuse.

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Section 112 of the Clean Air Act authorizes the establishment of national emission standards for hazardous air pollutants. However, it is unlikely that section 112 would be invoked to deal with PCBs for the same reasons that the other Clean Air Act authorities are generally not applicable.

E. THE EGG, MEAT, AND POULTRY ACTS

The Consumer and Marketing Service of the U.S. Department of Agriculture (USDA) administers three acts relevant to the PCB problem: The Egg Products Inspection Act (P.L. 91-597); the Wholesome Poultry Products Act (P.L. 90-492); and the Wholesome Meat Act (P.L. 90-201).

These authorities apply to meat, egg, or poultry products from the time they reach the processing plant until they are purchased by the consumer. Once they leave the plant, they also fall under the legal authority of the FDC Act as do all foods. USDA routinely checks meat, poultry, and egg processing plants, but relies primarily on local jurisdictions for inspection at retail outlets.

The egg, meat, and poultry acts essentially define a product as adulterated if it contains any substance in an amount which is judged deleterious to health. USDA follows guidelines established by FDA under the FDC Act for determining what amounts of a particular substance are deleterious. USDA can seize adulterated products or prevent them from being distributed.

F. THE OCCUPATIONAL SAFETY & HEALTH ACT (29 U.S.C. 651-678)

Chemical hazards in the workplace are regulated under the Occupational Safety and Health Act. The Secretary of Labor, in cooperation with the Secretary of Health, Education, and Welfare, is authorized to set and enforce occupational safety and health standards applicable to businesses affecting interstate commerce.

No specific standard has been set for occupational exposure to PCBs. However, the Department of Labor has set exposure limits for comparable substances, and it could enforce limits on PCBs by applying limits set for compounds such as chlorodiphenyl. The standard for chlorodiphenyl is 1mg per cubic meter - 8 hour average exposure.

G. ACT TO REGULATE TRANSPORTATION OF EXPLOSIVES AND OTHER DANGEROUS ARTICLES (18 U.S.C. 831-835)

The Department of Transportation (DOT) regulates the transport of hazardous substances under the Act to Regulate Transportation of Explosives and Other Dangerous Articles. The Act authorizes DOT to promulgate regulations for the safe transportation of such materials.

DOT has issued tentative test protocols for classifying substances according to their acute toxicity, but these have not yet gone into effect. Responsibility for insuring that standards are complied with rests initially with the manufacturer or shipper.

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II. STANDARDS, TOLERANCES, OR GUIDELINES ESTABLISHED

The most important limits which have been established for PCBs have been those established by FDA to deal with particular instances of food or feed contamination.

Standards or, more accurately, tolerances for products such as for PCBs may be established under Section 406 or Section 409 of the Food, Drug, and Cosmetic Act, which require a finding that the substance is required in the production of the food or cannot be avoided by good manufacturing practices or a showing of safety and a need for use. No permanent tolerances for PCBs have been established, since all the safety data necessary and the need for use to support such tolerances are not available at this time. In the absence of tolerances, the Food and Drug Administration, in order to respond to accidental contamination, has set interim guidelines for levels of PCB in some foods at which it will take action under the Food, Drug, and Cosmetic Act. It is now proposing to establish temporary tolerances for permitting unavoidable PCBs in several categories of food.

FDA has taken action to remove from the market shell eggs containing more than 0.05 parts per million PCBs and feeds containing more than 0.5 parts per million PCB where the PCBs present appears to be from accidental contamination of feed. The U.S. Department of Agriculture has also taken action to remove poultry from the market containing 5.0 parts per million PCBs where such contamination was the result of accidental contamination of feed fed to poultry. The action level of 5 parts per million (whole tissue basis) was established in 1971 by FDA. This level was reduced to 3 parts per million on a fat basis in 1972.

The Food and Drug Administration has taken no action against any other products for PCB contamination but has informed the States and others that it would consider action on milk if PCBs exceed 0.2 parts per million (whole basis) and on fish if PCBs exceeds 5 parts per million. Some States have taken action to remove milk from the market that contained more than 0.2 parts per million PCBs.

The temporary tolerances recently proposed by FDA are listed in Table 1.

The guidelines and the temporary tolerances taken into account available toxicological data, the estimated amount and type of intake of PCB from food, and also the sensitivity of the methods used for detecting PCB. Thus more PCB is allowed in poultry than in eggs because children are fed egg yolk, and children are not considered to have as efficient detoxication mechanism for handling PCBs as adults. It should be noted that these limits were established to deal with particular incidents, and thus may be changed as new knowledge develops or as circumstances change.

Some food has been discovered to be contaminated because of migration from food packaging materials containing PCBs. Thus FDA also has proposed that a temporary tolerance of 5 parts per million in paper packaging

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Table 1

FDA Proposed Temporary Tolerances for PCB Residues

Food	Tolerance
Milk	2.5 ppm (fat basis)
Dairy Products	2.5 ppm (fat basis)
Poultry	5 ppm (fat basis)
Eggs	0.5 ppm
Complete animal feeds	0.5 ppm
Animal feed components (including fish meal)	5 ppm
Fish	5 ppm (edible portion)
Infant and junior food	0.1 ppm
Food-packaging materials	5 ppm

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materials be established permitting unavoidable PCB residues in such materials for a period of one year. This will provide an opportunity for the orderly elimination of PCB-containing raw materials used in the manufacture of food packaging materials.

EPA recently has proposed regulations which would prohibit all intentional discharges of PCB into the water, and would limit PCB levels in the water to .01 parts per billion. These regulations probably would be enforced through use of the Refuse Act.

III. APPLICATION OF REGULATORY AUTHORITIES

Within the past two years there have been several incidents involving PCB contamination. These include the following:

In September 1969 FDA detected PCBs in West Virginia milk. The source of PCBs was suspected to be the use of spent transformer fluid as a solvent for herbicide spray. Grade A milk shippers involved were taken off production by the State.

In April 1970 FDA identified the presence of PCB residues in milk sampled by the Ohio State Department of Agriculture. The Department removed a large quantity of milk from the market. The chemical was traced to a material used as a sealant in the silos where dairy feed was stored. Similar occurrences of PCB contamination of dairy herds have been reported in several Southeastern States.

Since June 1971, the Meat and Poultry Inspection Program (MPIP) and the Poultry Division, Consumer and Marketing Service, USDA, have been surveying specifically for PCBs. Prior to that time, the MPIP's ongoing survey of chlorinated hydrocarbons should have detected any PCBs present in animal or poultry fat at a level of 1 parts per million or above. None was detected in the fat of poultry, swine, cattle, or sheep prior to December 1970. Since that time, there have been five separate incidents of contamination of poultry with PCBs. Each appears to be a single-source, one-time occurrence. The Poultry Division's egg sampling program in the Southeastern U.S. and in Minnesota has not detected levels of PCBs which are significant--most values falling below the sensitivity of the method.

Contamination of hens slaughtered on December 2, 1970, led to placing all laying hens in Orange, Sullivan, and Ulster Counties, New York, under quarantine through August 30, 1971, requiring pretesting for PCBs prior to slaughter. Levels up to 26.8 parts per million PCBs were found in the fat. Approximately 137,100 hens were condemned and buried on the farms. Flocks containing less than 5 parts per million PCBs were sold in commercial channels, frequently at drastically reduced prices. Eggs from contaminated flocks were destroyed. The source of contamination was feed containing returned bakery product wrappings.

Frozen turkeys produced on farms from Modesto, Fresno, Stockton, and Santa Rosa, California, were found to contain up to 28 parts per million of of PCBs in the fat. The source of contamination is unknown. All turkeys

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from these sources (approximately 100,000 lbs.) were detained until testing was completed (Feb.-May 1971). Muscle meat was salvaged and used in turkey rolls. Fat and skin containing over 5 parts per million PCBs went to nonfood uses.

Contamination of anchovy fish meal with PCBs from a leaky heat exchanger was discovered by the Monsanto Company in July 1971 in Wilmington, N.C. One immediate and noticeable result was poor hatchability of eggs from the poultry fed the PCB contaminated diet. Accordingly, USDA required that all poultry coming to market from these States be tested before marketing. During the first 2 weeks of testing, 541 samples were analyzed, representing over 2.5 million birds. Of these, 2.4 percent were retained until disposition could be made. The 88,000 chickens which had been fed the fish meal were destroyed by the owner of the chickens. FDA seized 75,000 eggs, 5 shipments of commercial fish feed, and 1 shipment of fish meal which had been contaminated, and USDA barred from market more than 30,000 pounds of processed frozen eggs. In addition, the processing firm recalled over 16,000 tons of the PCB-contaminated fish meal.

In September 1971, turkeys from one grower on eight farms in Detroit Lakes, Minnesota, were found to contain up to 20 parts per million PCBs (fat basis). One hundred forty flocks in the immediate area, including parts of Minnesota, North Dakota, and South Dakota, were tested , but no levels above 2 parts per million were found. Approximately 1 million turkeys were withheld from market by the single grower until residue levels were acceptable. The source of the PCBs has not been determined, but feedgrade fat contaminated with PCBs from a heat exchanger is suspected.

Also in September, the State of Michigan stopped its annual program of distribution of Coho Salmon from Lake Michigan, because the fish contained high residues of PCB and DDT.

In February 1972 chickens in Maine were discovered to contain PCB contamination of up to 172 parts per million in their fat. These contaminated chickens had been given feed from a plant in Thorndike, Maine, but officials have been unable to locate the exact source of the PCBs. More than a million chickens have been destroyed.

Many of these incidents have evoked criticism of the Federal Government for failure to detect the problem sooner or for failure to act more stringently. It must be recognized that insofar as detection of problems relies on inspection of food products being shipped to market, it is impossible to inspect even a small fraction of the foods being shipped. Factory inspection can detect some problems, but even this approach is severely limited by available resources. The prime reliance must be on controlling the use of the offending substance.

IV. FUTURE ACTIONS AND NEEDS

Enough data are available to indicate that PCBs are pervasive in the environment. The basic regulatory challenge is thus twofold: to minimize human exposure to PCBs already present in the environment and to prevent more PCBs from entering the environment.

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Based on available monitoring data and reports, one route of human exposure to PCBs currently in the environment is through food. The PCB contribution made by other routes of exposure has not been sufficiently measured.

The FDA has issued a proposal which will prohibit the use of PCBs in and around food processing plants and will establish limitations on the use of salvaged paper containing industrial chemicals for food packaging. These proposed actions should prevent occurrences such as the Wilmington incident and the problem of PCBs in food packaging materials. However, there will still be problems, as evidenced by the Coho Salmon contamination, the mysterious Minnesota turkeys, and the discovery of high levels of PCBs in cardboard food containers. The solution to these problems seems to lie in a better understanding of the path which PCBs follow through the environment and on full use of existing regulatory authorities. Even with better understanding we can probably expect future isolated incidents of PCB contamination.

Existing regulatory authority is generally inadequate to prevent more PCBs from entering the environment. The Monsanto Company has reported voluntarily limiting the distribution of PCBs to "closed systems" but this limit has no force of law behind it. The government has no power to restrict imports of PCBs by foreign manufacturers, and if it disagreed with Monsanto's judgment on allowable uses it could not impose more stringent limitations on Monsanto or on any other potential manufacturer.

This regulatory gap would be filled by the Administration's proposed Toxic Substances Control Act. The proposed Act, sent to the Congress in February 1971, would authorize the Administrator of EPA to restrict or prohibit the use or distribution of a chemical substance if such restriction were necessary to protect health and the environment, and it would also authorize him to issue standards for tests to be performed and for results to be achieved from such tests for various classes and uses of new substances. Thus, in addition to providing the regulatory authority needed to deal with the PCB problem, it would also establish a system for preventing new chemicals from becoming similar problems. Action by the Congress to approve the Toxic Substances Control Act is the most important step which can be taken to deal with PCBs and similar problems.

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MONS 219008

EPA 330/9-73-033



Attachment 1- 2

MONS 219009

EPA 560/4-76-003

INDUSTRY VIEWS ON THE USE OF POLYCHLORINATED BIPHENYLS IN TRANFORMERS AND CAPACITORS

Prepared by the

OFFICE OF TOXIC SUBSTANCES

U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUNE 1976

MONS 219010

PREFACE

In January 1976, EPA Administrator Russell Train met with manufacturers and users of PCB products. As a result of those two meetings, three industry task forces were formed and the findings of the task forces were presented to the Administrator at a meeting in May 1976.

This report is a compilation of the statements made by industry leaders at the three meetings.

MONS 219011

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Richard Rollins
Vice-President, Jard Company
Representing the Electronic Industries Association

January 14, 1976

PCB's IN CAPACITOR APPLICATIONS

Mr. Train, Ladies and Gentlemen:

On behalf of the Electronic Industries Association and the manufacturers of PCB-filled AC capacitors, I appreciate this opportunity to present our views on PCB capacitors and possible alternatives for PCB's.

The manufacturers have almost exclusively used PCB's in capacitors for the fluorescent and mercury vapor lighting, air-conditioners, television sets and power factor correction applications since World War II.

This capacitor is thus near you a high percentage of the time. Manufacturers are very cognizant of their responsibilities in providing a capacitor that will operate satisfactorily in these applications, providing a long life and high reliability at a reasonable cost. With these requirements in a competitive marketplace, the consequence is that these components must constantly be reevaluated to increase life, increase reliability, decrease size and decrease cost. We, as manufacturers, see these pressures for improvements every day.

Why, therefore, hasn't the U.S. capacitor industry developed suitable alternatives to PCB's in 40 years? One of the answers lies in the nonflammability of the PCB material. Because of applications, such as lighting, where personnel and equipment safety are paramount, capacitors must be manufactured such that they not only fail infrequently, but also fail safely. In an application such as the World Trade Center in New York where 250,000 fluorescent lights are installed, it is obvious that high reliability and a nonflammable capacitor characteristic are mandatory. A capacitor which fails violently and contains a flammable fluid could create a serious problem, especially in densely populated buildings, giving visions of a "towering inferno". The Consumer Products Safety Commission, as an example, have shown considerable concern over television set fires and have requested Underwriters Laboratories to develop standards for safety for television receivers.

A second reason lies in the reliability of the product as it is known today. Presently the capacitors our companies manufacture have a survival rate per year greater than 99.9988%. The requirements that more than 95% of our capacitors must survive after 13 years of normal application conditions must also be met.

MONS 219014

The test time and amount of product tested necessary to guarantee the above reliability is mind-boggling to say the least. Many thousands of units and millions of unit hours at or referred to application conditions are required to satisfy our statisticians that any change in product will perform to these present day standards.

Even with the large amount of previous testing and history on the PCB containing capacitor, there have been instances which, despite all controls in existence, caused consumer concern due to extreme failure rates (greater than 10%). The first occurred in 1957, when a variation in the quality of PCB fluid, as synthesized, produced a highly unstable capacitor. Standard analytical tests in use at the time could not detect the quality difference. The result was a large number of capacitors failing in a very short period of application life. The consequence was the requirement, by the customer, that the capacitor manufacturer not only provide compensation for the cost of the capacitor but the cost of the equipment which contained the capacitor plus the labor charge for replacing the equipment in installation. The total replacement cost to the manufacturer thus became 100 times the original price of the capacitor.

A second instance of numerous failures occurred six years later involving this time the capacitors from most manufacturers. In this circumstance, reduced-size capacitors were tested and approved by industry-accepted accelerated life testing and the new sizes were shipped to customers. Approximately one year later, up to 15% of these capacitors began failing in some applications. A subsequent modification in the accelerated life testing, based upon the findings in field failure analyses, now provides proper screening which eliminates the chance of this problem recurring.

The AC capacitor industry is therefore very sensitive to the possible effects of changes and insists upon very extensive screening before releasing new designs or using new materials.

As previously mentioned, alternates have been considered ever since the introduction of PCB's. Now the substitutes must not only be a satisfactory dielectric fluid providing acceptable life, reliability, and safe failure modes, but, in addition they must not cause environmental problems.

Our experiences with PCB's have demonstrated that some material will escape into the environment through processing, etc. Therefore, alternate fluids must be evaluated on this basis. The effects on man and his environment must be evaluated before the product is introduced.

It would be a very serious error to inadequately evaluate and prematurely replace capacitor grade PCB's with a fluid which eventually becomes a greater threat to man and/or his environment.

MONS 219015

Non-PCB alternatives are now being offered or suggested, some are new and some have been available for many years. The industry's position on these is as follows:

1. Mineral Oil is a flammable fluid, which was replaced by PCB's in the 1930's. Capacitors using it are 50 to 100% larger, much less reliable and much less safe than those using PCB's. The substitution of mineral oil would necessitate redesign of equipment to utilize the larger capacitors, would require an increase in the capacitor manufacturing facilities and would result in increased use of basic materials which are presently in short supply.

2. Modified synthetic hydrocarbon oils have been developed which, while flammable, would allow capacitors to approximate today's sizes. Samples have been distributed for testing, but the material is not commercially available.

3. Phthalate Ester, also a flammable fluid with biodegradability problems, it should be noted, has been used in certain restricted applications where conditions of limited temperature requirements exist. The unknown factors of reliability and safety in the broad consumer use areas such as lighting now prevent its use. Evaluations, however, are continuing.

4. Substituted Aromatic Compounds are possible candidates and one has been proposed that has less fire resistance than PCB's, and is suggested to be a good dielectric fluid, but only for high voltage power factor correction applications. This to our estimation represents only 17% of the PCB usage in closed systems, and leaves completely unanswered any alternative(s) for the remaining 83% of the applications. Although some material has been produced, the fluid has not been made commercially available. When samples become available, the time-consuming testing can begin. It has been estimated that approximately three years are required for final commercial use after initial testing of a change in capacitor fluids.

Also, proposed for limited applications is the use of a plastic film replacing the kraft paper dielectric in the AC capacitors. Although evaluations for small industrial capacitors with this material have been underway for more than two years, the reliability of the product is only 1/20th of the present capacitor in most applications. Significant additional testing is required to determine the cause of the poor reliability.

MONS 219016

In summary, there are no commercially available fluids which today can be considered a totally acceptable substitute for PCB's in the broad range of AC capacitors. Nor, in fact, are there substitute dielectric systems which would satisfy the requirements of reliability and safety in most applications.

Finally, our industry believes we should work together with the EPA to promote mutual understanding and to attempt a cooperative effort for solving our mutual problem with polychlorinated biphenyls.

MONS 219017

Herbert M. Appleton
Vice-President, McGraw Edison Company

January 14, 1976

Thank you, Mr. Train, for your invitation to meet with you to discuss polychlorinated biphenyls.

We believe there is no question that PCB's eventually must be eliminated from all products going into the marketplace. The only question can be, "When?" No other position is defensible.

As a major manufacturer of power capacitors, McGraw-Edison Company has recognized the PCB problem. We have a modern plant and control our emissions carefully, but we can't control the ultimate destination of millions of pounds of PCB's shipped in our products, which someday will be entering the environment.

Believing this to be a major concern, four years ago we sought, with the help of Dow Chemical, to find a non-toxic, biodegradable substitute for PCB's in high voltage power capacitors. We have succeeded and are offering a diphenyl oxide formulation to the power capacitor industry. It can be substituted in present designs, using existing process equipment.

This diphenyl oxide capacitor fluid is up to 20 times less toxic, far more biodegradable and easier to dispose of than PCB's. Electrically, it is equal to or better than PCB's in our tests.

Flammability in power capacitor impregnant is not a major issue, we believe, since most units use less than three gallons. The National Electric Code allows this to be installed without a vault in a building. The flash and fire points are better than mineral oil although not as good as PCB's.

Someday there may be developed a better, cheaper, universal liquid for capacitors, transformers, ballasts, etc., but we do have an answer now to capacitors. Dow Chemical promises to have production quantities available by mid-1976 and in large quantity by the end of 1976. Manufacturers can get sample quantities now to begin their tests.

MONS 219018

F. J. Fitzgerald
Vice-President, Monsanto Chemical Company

January 14, 1976

Good afternoon, my name is Jack Fitzgerald. I am a vice president of Monsanto Company, a member of its Corporate Administrative Committee and managing director of Monsanto Industrial Chemicals Company, an operating unit of Monsanto Company.

Since I am responsible for the operating unit which manufactures polychlorinated biphenyl dielectric fluids, John Hanley, our president, has asked me to represent him today and reaffirm to you Monsanto's commitment to continue working with the EPA and the electrical industry in finding solutions to the PCB issue.

Let me state at the outset that Monsanto agrees wholeheartedly with EPA's desire to work toward the goal of eventually eliminating all uses of PCB's.

Monsanto has already taken several steps designed to restrict the entry of PCB's into the environment.

First, Monsanto began restricting the use of PCB's solely to closed electrical systems, for which no viable alternates existed, back in 1970. It should be noted that this voluntary program was fully implemented prior to the completion of the study done on PCB's by a Federal Interagency Task Force in 1972.

Secondly, Monsanto has been working for a number of years on non-PCB replacement products. These materials, designed to replace PCB fluids in capacitors and transformers, are currently being evaluated by the major electrical manufacturers in the United States.

While the PCB issue is a tough one to handle, the difficulty does not nor will not in the future stem from any lack of cooperation on the part of Monsanto. The problems that we face, collectively, are rather rooted in the unique characteristics of PCB's and the irreplaceable role they have served in our electrical-industrial environment for the past 45 years. The challenge: Replacing them in an orderly manner without creating another hazard of equal or potentially greater consequence, while at the same time avoiding serious power and transportation disruptions.

Let me emphasize that we have no desire to remain in the PCB manufacturing business any longer than is necessary. By this I mean as soon as we are satisfied that the electrical power supply industry's needs for usable, acceptable alternate dielectric fluids have been met by whomever, Monsanto will voluntarily shut down

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its PCB manufacturing unit. In the interim, we will continue to work with industry and government to ensure that the restrictive measures and controls we implemented in the early 1970's remain in force and are diligently pursued.

MONS 219020

John F. Welch
Vice-President, General Electric Company

January 14, 1976

General Electric welcomes the opportunity to participate in today's proceedings and wishes to compliment Mr. Train and the EPA for the constructive manner in which they have approached this very complex PCB issue. A cooperative effort between government and industry can avoid the delays brought about by adversary proceedings and should truly benefit the public at large.

As the leading industrial user of PCB's in the manufacture of capacitor and transformer products, we have pursued a parallel course both to reduce the PCB discharges from our manufacturing plants and to find an acceptable substitute for their use in electrical apparatus.

The public record shows that we have made excellent progress in lowering PCB discharge levels at all related manufacturing sites. Our technological developments have positioned these facilities to achieve discharge levels in the ounces-per-day range. However, progress has been more difficult in the search for a PCB substitute.

General Electric for the past 30 years has attempted to find a suitable substitute. In the early years, this effort was directed to improving the economy and performance of its electrical apparatus, but in the past several years, the emphasis has been to provide a more environmentally acceptable substitute. We have tested over a hundred fluids representing the full spectrum of chemical substances, and although there are promising leads, they all require additional long-term testing for reliability, safety and environmental compatability.

For example, in capacitors, all known potential substitutes, unlike PCB's, are flammable. This characteristic presents a significant problem to the users of capacitors: the appliance, lighting and several other consumer-related industries.

Consumer product safety is just one of the many complex issues which have to be resolved in evaluating a PCB substitute. Environmentally, as a minimum, we must be satisfied that any substitute considered is a significant improvement over PCB's.

As we stated at the outset, General Electric is most willing and indeed anxious to cooperate with EPA in their goal of finding a satisfactory substitute for PCB's in electrical apparatus. However, we urge that the complexity of this issue and the potential consequences of precipitous action be thoroughly and thoughtfully

MONS 219021

considered. Industry and government have the opportunity to demonstrate, on this highly visible PCB issue, that they can work together in solving environmental questions in the best interest of the public.

MONS 219022

D. M. Sauter
Vice President, Westinghouse Electric Company

January 14, 1976

Westinghouse very much appreciates the opportunity to make these comments at this conference. It is the hope of Westinghouse that this meeting will be devoted to the safety aspects of electrical equipment. Westinghouse recognizes that environmental effects are one of the many elements that affect human safety. The production, use and operation of electrical equipment must not increase the danger to humans.

Since the early 1970's, when scientific studies indicated that polychlorinated biphenyl mixtures presented some hazard in the environment, Westinghouse has expended considerable money and effort to reduce the amount of Aroclors 1016 and 1242 that might escape into the environment. Measures that have been employed are: sealing drains in manufacturing areas where Inerteen is used; (note - Westinghouse uses the term Inerteen for Aroclors 1016 and 1242); utilizing specially designed incineration facilities for the destruction of scrap Inerteen and special scientific landfills for the disposal of Inerteen contaminated material; instructing operating personnel and our customers regarding the need for care, and that special waste disposal is required; and reducing the number of pounds of Inerteen for each rating of transformers and capacitors. Most of these measures were implemented prior to the enactment of the Federal Water Pollution Control Act Amendments of 1972.

Westinghouse recognized that these measures could not prevent the total elimination of Inerteen escaping into the environment. Therefore, concurrent with the above measures, we have conducted extensive evaluation programs designed to utilize those mixtures of polychlorinated biphenyls having low persistence and high biodegradability in the environment. By February 1968, Westinghouse determined that a mixture of polychlorinated biphenyls, sold by Monsanto as Aroclor 1242, would be satisfactory as Inerteen for transformers. Aroclor 1242 contains about 91% of the lower isomers (containing 4 chlorines or less) that more readily biodegrade in the environment. This material has been used by Westinghouse since that time with the understanding that over 90% of any small amounts that did enter into the environment would have relatively low persistence.

Monsanto subsequently developed a new material from Aroclor 1242 which contained more of the lower chlorinated isomers and marketed this material as Aroclor 1016. By the first quarter of 1972, this material was introduced by Westinghouse into the manufacture of all capacitors. This material contains 99% of the more biodegradable isomers (4 chlorines or less) so that less than 1% of this material that might escape into the environment might be more resistant to biodegradation.

MONS 219023

The industry, Monsanto, our own research of the scientific literature and most of the papers presented at the EPA Conference in Chicago have indicated that the lower chlorinated mixtures of polychlorinated biphenyls are more biodegradable and do not present the same long term toxic environmental problems as those which contain the higher chlorinated isomers. It is interesting to note in this regard, that not only have Environment Protection Agency researchers found a significant difference between the effects of Aroclor 1242 and Aroclor 1016 on rats, but also Dr. Robert W. Riseborough and Dr. Ian Nisbet concluded that there were significant differences between the various mixtures and that comments concerning the higher chlorinated mixtures should not be associated with the lower chlorinated mixtures.

Because of the long term nature of biodegradable and toxicity tests, limited data is available on Aroclor 1016 and Aroclor 1242. We hope the government is gathering test data on biodegradability, toxicity and flammability of 1016 and 1242. Otherwise, industry as it develops alternate fluids will have no sound basis for comparison.

To gather data to evaluate alternate fluids, Westinghouse after 40 years of experience, has found these steps necessary:

1. Check the fluid for possible harmful effects to the environment.

2. Check the electrical characteristics.

3. Check for safe handling.

4. Check or availability, wide use and economic feasibility.

5. Make small model capacitors and transformers and check for system compatability.

6. Perform accelerated life tests on small model capacitors and transformers.

If a fluid passes step one through six it becomes a candidate for full scale tests.

Westinghouse instituted development programs to evaluate various fluids as possible impregnants for high voltage power capacitors and transformers using these six steps over five years ago. These programs were first aimed at consideration and testing of several known existing impregnating fluids and, secondly, to seek out and test new fluids as possible impregnants. This effort has been carried out at both Research and Development Laboratory levels and plant engineering levels.

In the first phase of this program, it was determined that none of the known available capacitor impregnants were a satisfactory replacement for Aroclor 1016 either due to poor electrical performance at the high voltage stresses required, or due to poor flammability characteristics. Similar results were found when testing for substitutes for 1242 which is used in power transformers.

In the search for new fluids, a large number of raw material suppliers of chemicals and petrochemicals have been contacted. Among these have been Dupont, Dow Chemical, Dow Corning, Monsanto, Sunoco, Exxon, Pilot Chemical, Union Carbide, Nippon Oil, Prodelec, Pittsburgh Chemical and USS Chemicals. Many tests have been carried out with materials supplied by most of the above suppliers, some tests on the fluids themselves and others using the more promising fluids in both small model capacitors and in full-size capacitors units. Although none of these fluids have flammability characteristics equal to that of 1016 fluid, some have adequate electrical performance sufficient to consider them as possible replacements for Aroclor 1016 should this action become necessary. In the transformer area, no economical substitute for Aroclor 1242 could be found with adequate flammability characteristics either. The electrical characteristics of mineral oil obviously are suitable for power transformers if flammability could be ignored.

Precipitous action to replace electrical equipment would result in billions of dollars spent by utilities, industrial plants and commercial installations. While this could increase orders for electrical manufacturers it would be a disaster for customers who would have to replace equipment prematurely and rebuild their electrical systems. The Government is meeting with utilities and will learn of capacitor replacement problems. Industrial and commercial customers are the primary users of askarel power transformers. They should be included in government meetings since they will be faced with unreasonable costs for replacements also.

In conclusion, Westinghouse believes the U.S. Government and the scientific community should determine the biodegradability, toxicity and flammability of Aroclor 1016 and 1242. The tests and results for these two askarels can then serve the electrical industry as standards that should be improved upon. By putting forth scientific data and performing suitable tests or alternate fluids, the U.S. Government can assist the electrical industry in selecting alternate fluids which potentially are less dangerous to man and his environment.

MONS 219025

Richard L. Hauser
President, Electrical Utilities Company

January 14, 1976

Mr. Train, my name is Richard Hauser. I am President of the Electrical Utilities Company in La Salle, Illinois. My company manufactures capacitors used in air conditioners, television receivers, lamp ballasts, and many other types of equipment.

As is the case with similar capacitors made by other manufacturers in the United States, they are almost all impregnated with polychlorinated biphenyl, known as Monsanto Aroclor 1016. In common with other aroclors, this material is non-flammable in the usually accepted sense.

In the pursuit of the goal of phasing out PCB's in the United States, I believe it is imperative that we take into consideration not only the adverse environmental effects we are trying to minimize, but also the safety impact of these actions.

One consideration which must be faced squarely is the matter of flammability. There are literally hundreds of millions of small industrial capacitors impregnated with non-flammable polychlorinated biphenyl (PCB's) in service today. I am not concerned about their contribution to fire hazard in these existing installations. However, an additional 50 to 75 million of these capacitors are being placed in service each year.

The materials the Electrical Utilities Company has tested may be more environmentally acceptable than PCB's, and they have other characteristics which make them reasonable candidates for use in industrial capacitors; however, they have flammability characteristics as dangerous as those of ordinary mineral oil. I am aware that there have as yet been no serious fire problems attributable to capacitors in Japan since they switched from PCB's to other impregnants. I am aware that pressure interrupting devices in some applications or electrical fuses can be used to reduce the possibility of case ruptures or fire when a capacitor fails. These safety devices, while reasonably reliable, are by no means completely effective. There also may not yet be many non-PCB capacitors in service in Japan. Failures are more likely to occur in application when the capacitors are older. Unless some other component in equipment fails first, or capacitors are removed from service for other reasons, all small industrial capacitors will eventually fail in service.

Because of the large number of capacitors being put into service, if they contain a flammable dielectric, it is my opinion that it will not be long before the first failure occurs resulting in a fire. The Electrical Utilities Company has already had a fire in our factory while experimenting with non-PCB's.

MONS 219026

If our industry agrees to phase out PCB's, EPA should agree to help us coordinate the introduction of non-PCB's with those organizations and agencies that will be concerned with flammable capacitor dielectrics. Underwriters Laboratory, the Consumer Product Safety Commission, and insurance companies using the National Electric Code will be some of the organizations concerned.

Also, my company has no wish to jeopardize its own survival, as well as peoples' lives and property, by producing a product which is not as safe as capacitors are today. If we are forced to use flammable dielectrics, some type of government sponsored indemnification for potential damages could greatly aid users of non-PCB capacitors and reduce the risk to capacitor manufacturers potential damages pose.

I hope that in our mutual search for reasonable alternatives to PCB's you will take these suggestions into account.

MONS 219027

John P. DeLong
Director, Power System Operations, TVA

January 22, 1976

TVA POWER SYSTEM

USE AND CONTROL OF POLYCHLORINATED BIPHENYLS (PCB's) ASKAREL

There are two uses of askarel on the TVA system in quantities of any significance. This is in transformers and capacitors. We have slightly over 700 gallons of askarel in storage among 10 storerooms. In addition there are thousands of small capacitors and relays, but each of these has only an ounce or less of askarel. We also have a few hundred motors which contain starting capacitors with just a few ounces in each.

Transformers filled with askarel do not burn or sustain fire under conditions of internal electrical arcing. Various Federal, state, and local conditions require use of askarel in transformers for use in locations where electrical fires present the greatest potential danger to life and property.

We have approximately 1,350 transformers filled with askarel that are installed in hydro, steam, and nuclear generating plants for indoors, vaults, or special applications where fire protection is important. The total quantity of askarel used in these transformers is about 850,000 gallons. These transformers, depending upon the rating, each contain some 50 to 1,000 gallons of askarel. Out of all the askarel-filled transformers at the plants the only failures in the last 20 years have been the small high-voltage precipitator transformers. We have experienced over the last few years two or three of these failing a year. Each of these holds 50 to 100 gallons of askarel. In the past these transformers were repaired in an area of our central service shop where, if a spill had occurred, the askarel would not have entered a floor drain but would have drained into a catch sump area. For future repairs this is being discontinued. The transformers and associated filtering equipment will be repaired and handled inside a steel curbed pan with a volume that will hold the full amount of askarel that the transformers contain. This will result in a completely sealed system and eliminate the danger of spillage. The soiled rags and solids will be collected in a sealed tank and held for future disposal.

Capacitors are used on the electrical transmission and distribution system as devices to control voltage and by correcting power factors reduce system transmission and distribution losses. We have approximately 82,000 capacitors totaling 5,595,000 kvar's in use on the TVA system. These capacitors vary in size from 15 kvar for the older ones up to 200 kvar for the new ones. The new ones

MONS 219028

are not much larger physically than the old style, so the whole group would average 2 to 2 1/2 gallons of askarel per capacitor. This will give a total of 160 to 200 thousand gallons in all capacitors.

Approximately 2/3 of the capacitors are installed in TVA substations mounted on steel structures, over graveled area, and inside a security fence. The other approximately 1/3 are located on TVA power distribution systems usually in clusters of 3 to 12 capacitors mounted on a pole structure primarily in rural areas. Our major disposal problem has been with the failed or retired capacitors. On an average, 250 fail each year and another 50 are retired due to obsolescence. Since each capacitor is protected by an individual fuse, seldom does a failure result in a ruptured case and loss of askarel. From the above totals, you can see that we would have a total of approximately 1,050,000 gallons of askarel in use on the TVA system.

In the early 1970's TVA considered storing failed capacitors and solid material containing askarel until a standard disposal procedure was approved by the Federal government. However, it was felt that the storage and shipment of failed and obsolete capacitors (approximately 300 per year) would be a hardship and, therefore, the American National Standard Institute "Guidelines for Handling and Disposal of Capacitor and Transformer Grade Askarels Containing Polychlorinated Biphenyls" were adopted. These guidelines state that failed capacitors should be disposed of only in dry landfilled sites which met all applicable state standards. All waste liquid askarel should be disposed of by incinerator at a suitable facility. TVA has plans to send all waste askarel to the Monsanto Chemical Company for disposal when sufficient quantities are available. Until then it is being stored in glass-lined tanks. All solid waste which had been saturated with askarel was disposed of in a dry landfill that met state requirements.

In late 1975 TVA reviewed its guidelines for disposing of failed units and PCB's because of problems incurred with storage, collection, and transportation to the various sites. It was desirable to develop a standardized method of handling failed or obsolete units within TVA and to effect the final disposition of these units. It was felt that landfilling was probably not acceptable as a permanent solution. A decision was thereby reached to cease the practice of disposing of defective capacitors in dry landfilled areas. The decision was made to return all defective capacitors to a storage warehouse where they will be held until an appropriate method of disposal is determined. Units which might leak during transit are to be drained into a suitable closed and sealed container. Drained units are to be protected from rainwater to prevent leaking askarel into the environment. These returned units are being accumulated and stored until an environmentally satisfactory method of disposal is found or developed. No units are presently being discarded in landfills.

MONS 219029

TVA's Solid Waste Management Staff, of the Division of Environmental Planning, is working on an environmentally and economically satisfactory method of disposing of these PCB materials. This staff is investigating in cooperation with EPA and others the adequacy of Chem-Dyne Corporation's incinerator recently placed in service in Ohio. This incinerator can operate at 2,200 degrees Fahrenheit with a residence time of 3 1/2 seconds which is sufficient temperature and residence time to destroy PCB's. The corporation has expressed an interest in testing this method of disposal of capacitors and solid waste material soaked with askarel. If this method of disposal is environmentally satisfactory, TVA will probably develop plans to ship accumulated askarel materials to the Ohio facility.

The Division of Environmental Planning is also coordinating within TVA the following actions:

1. Inventory of transformers containing askarels; review of procedures for collection, storage, and disposal or reuse of small amounts of waste liquid askarel, transformer components contaminated with askarels, and solid waste materials soaked with askarel.

2. Development of a contingency plan based upon the existing Spill Prevention, Control and Countermeasure Plan for transporting transformers filled with askarel to and from the service shops.

3. Development of engineering design plans for containment of askarels to avoid the escape or discharge of PCB's into water courses as part of the ongoing work related to the National Pollutant Discharge Elimination System permit program activity.

4. Review of procedures for storing obsolete capacitors and containers of askarel to avoid escape or accidental discharge of PCB's into the environment.

5. Issuance through TVA's Hazard Control Compliance Staff of a hazard awareness bulletin for the purpose of protecting employees' health and safety. TVA's Industrial Hygiene Branch and Safety Engineering Staff will inspect the work places periodically to ensure that the control measures identified in the bulletin are implemented.

MONS 219030

W. B. Bolger
Executive Vice President, Commonwealth Edison Company

January 22, 1976

MANAGEMENT OF PCB's ON UTILITY PROPERTIES

Because of their non-flammable and extremely stable chemical characteristics, PCB liquids such as Askarel have been used in capacitors and certain indoor transformers on utility systems for many years. Until the late 1960's, even though these fluids were regarded as safe industrial chemicals, the need for following good housekeeping practices in handling Askarel has long been apparent to the utilities. Aside from environmental concerns, it is essential that such insulating materials be protected from contamination by water, dirt, or other liquids. The environmental concerns with PCB's identified in the late 1960's added further emphasis to the importance of careful handling of PCB liquids. These concerns called for the control of Askarel to a much greater extent than of other insulating liquids, and led the American National Standards Institute to issue Standard C-107, guidelines for handling and disposing of transformer grade Askarels. Commonwealth Edison participated in drafting this standard and we are complying with its requirements. We recognize that, in the light of EPA's more recent concerns, more must be done. The following are the good housekeeping principles we feel are most important.

Inventories of PCB liquids must be closely controlled. Equipment containing PCB's should be inspected for leaks upon receipt and again when permanently installed. Small quantities of Askarel are needed each year to make up for losses and replace contaminated liquid.[1] Askarel is shipped in sealed five-gallon cans which are clearly labeled to identify their contents, and should be inspected for leakage upon receipt. Storage of these cans should minimize the risk of accidental puncture and avoid the possibility of any environmental contamination through sewers or seepage. Used Askarel should be accumulated and safely stored pending disposal. Askarel should be only used for approved purposes and unused quantities returned to stock. Accountability records should be maintained.

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[1] At Commonwealth Edison, we have about 1.0 million gallons of Askarel in use. Last year we purchased 2,100 gallons for make up and returned 2,000 gallons to Monsanto for disposal. The returned portion consisted of contaminated fluids plus drainage from junk capacitors. Some additional fluid in Askarel-saturated materials was also returned. Actual losses to the environment, while difficult to quantify, were very small.

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Handling procedures in the shop as well as the field should avoid release of PCB liquids to the environment. It is important to avoid any possibility of introducing PCB's into regular insulating oil handling systems and oil-filled equipment. For example, hoses and pumps used for regular transformer oil should not be used to handle Askarel. When filling or draining Askarel from electrical apparatus, steps should be taken to keep accidental spills from entering floor drains or seeping into the ground. Used Askarel and Askarel-contaminated materials such as rags, solvents, and sweeping compounds, should be collected and stored in sealed containers pending shipment to approved disposal facilities.

Disposal of Askarel and Askarel-saturated materials requires special attention. Commonwealth Edison's practice is to seal them in steel drums and return them to the manufacturer for high-temperature incineration. Disposal of Askarel-insulated apparatus also imposes special problems. It is virtually impossible to completely decontaminate the insulation in Askarel-filled transformers and capacitors. Therefore, it is necessary to dispose of them in a manner which will prevent the release of Askarel to the environment. Ordinary salvage practices are not sufficient. There are several companies qualified to handle the disposal of Askarel-contaminated capacitors and transformers.

There is no way to eliminate the risk of accidental Askarel spills. They can occur as a result of handling accidents or equipment failures. In order to minimize the environmental impact of such mishaps, it is important that utilities have spill control plans. These plans should provide for prompt recovery of any Askarel released to the environment and the safe disposal of all contaminated materials.

Finally, utility procedures should provide for control of Askarel-contaminated clothing. At Commonwealth Edison, workers who handle Askarel are instructed to wear face shields, gloves, and plasticized coveralls. The use of non-absorbant disposable clothing eliminates the problem of Askarel contamination from laundry water. Solvent is provided in which workers can rinse their hands.

The ANSI C-107 drafting group is now reviewing the Standard in response to EPA's concerns and expects to make appropriate revisions in the near future. EPA has identified the need to tighten the requirements concerning handling and cleaning of workers' clothing, disposal of laundry water, and requirements for solid waste disposal. We believe there are practical solutions to these concerns which can be incorporated into the Standard.

We are hopeful that within the next few years environmentally acceptable non-flammable substitutes for PCB fluids will be developed and used in all newly-manufactured equipment. Unfortunately, the flammable characteristics of those identified so far are inferior to Askarel. Even when a substitute is found, a large amount of

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Askarel-filled equipment will still be in service. Replacement of this equipment is not economically feasible or environmentally desirable. It will be difficult, if not impossible, to flush enough PCB from existing transformers to avoid contamination of a substitute insulating material. Since capacitors are in sealed cans, there is no practical way to change the insulating fluid. Obviously, the handling and disposal of so much equipment on an accelerated schedule will greatly increase the risk of accidental spills, and the cost would be prohibitive. Therefore, the only practical approach is to limit the use of Askarel to existing facilities and those new installations where substitutes are unavailable. Or at the same time, maintain procedures for the control of Askarels to be upgraded wherever feasible in order to minimize future release of PCB's to the environment.

It is important for utility management to understand the problems associated with the use of Askarel and develop procedures for dealing with it. It is equally important that these procedures be properly implemented. Personnel training is an essential element in proper implementation, but indication of top management concern and insistence that Askarel control procedures be followed is equally important. I believe that the presence of top utility management at this meeting is strong evidence of their recognition of the problems and their commitment to solving them. We are convinced that good PCB housekeeping procedures will assure that the utilities can continue to use PCB insulating liquids in transformers and capacitors without adverse impact on the environment.

MONS 219033

R. E. Uptegraif
Transformer Manufacturers Task Force/
National Electrical Manufacturers Association

May 13, 1976

PROBLEMS ASSOCIATED WITH THE BAN ON THE USE OF PCB's (ASKARELS) IN TRANSFORMERS

In attempting to analyze the extremely complex problems that would result from a ban on the use of PCB's in transformers, it is logical to first consider the various sectors that would be affected·

1. Manufacturers of new transformers;
2. Transformer service and repair companies;
3. Architects and construction consultants;
4. Buyers, such as contractors, industrials, governmental agencies, utilities, etc.;
5. Users, such as apartment owners, commercial building owners, hospital administrators, shopping center owners, etc.;
6. Regulatory agencies, such as the Environmental Protection Agency, Department of Transportation, U.S. Coast Guard, Underwriters Laboratories, National Electrical Code, etc.;
7. Insurance companies, as regards fire hazards and general insurability of locations where substitute liquids may be used; and
8. The courts, as regard litigation for settlement of claims.

Some of the concerns of the transformer sectors are as follows:

1. The inability of certain users or owners to obtain askarel-filled transformers or some equivalent where the location or space is limited in existing buildings or buildings currently under construction.

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* Not in official presentation to EPA

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2. The fire hazards associated with the ill-considered use of oil-filled transformers in locations that presently call for the use of nonflammable transformers.

3. The technical or engineering problems associated with the use of oil-filled transformers in locations that presently call for the use of nonflammable transformers.

4. The fire hazard and insurability problems associated with the use of relatively untried substitute materials.

5. The technical and engineering problems that could arise in using dry type transformers as replacements for askarel-filled units.

6. The serious consequences, both technical and financial, that would result if an entire transformer system had to be changed because of inability to replace or modify any part of an existing askarel transformer system.

7. The inability of the transformer manufacturer to honor express or implied warranty on askarel-filled units in the event that no equivalent liquid is available.

8. The problems associated with retro-filling existing askarel units with replacement liquids should the PCB ban make this become a requirement. It is our opinion that large scale retro-filling with other liquids should be avoided as the environmental hazards of such a program would be greater than if the askarel-filled transformers were allowed to remain in service throughout their useful life.

9. The possibility that some substitute fluids may also present future environmental hazards. We feel that before the transformer industry adopts any replacement for askarel, some form of official sanction should come from EPA.

10. The problems, both technical and financial, associated with the cleanup of existing manufacturing, transport, and service facilities that have been handling askarels. We recommend that ANSI Standard C-107.1 "Guidelines for Handling and Disposal of Capacitor and Transformer Grade Askarels Containing PCB's" be given official sanction by EPA so that askarel users have clear guidance in dealing with the cleanup problem.

11. The severity of fines for accidental spills and discharges of PCB's into the environment, as called for in 40 CFR Part 116-119, in the event EPA finds "gross negligence". "Gross negligence" is not specifically defined and does not appear to be established in guideline rules or regulations, violation of which would imply "gross negligence".

12. The possibility of problems arising regarding the disposition of askarel-filled transformers already manufactured, both in service and in storage, when and if these were to be banned.

In analyzing all of these concerns of the various transformer sectors, there is one major and overriding key issue; and that is the timing of the implementation of a ban on the use of PCB's. A corollary key issue, associated with timing, is that effective dates be broadly communicated to all of the transformer sectors.

Adequate specific timing and communication will enable the transformer users, buyers, manufacturers, and other concerned sectors:

1. To intelligently plan an orderly withdrawal of PCB's from commerce with minimum economic impact;

2. To obtain and technically evaluate substitutes;

3. To obtain environmental qualifications on substitutes;

4. To attempt to resolve problems dealing with the National Electrical Code, Underwriters Laboratories, and other fire code writing bodies such as local municipalities;

5. To attempt to clarify general insurability of installations using substitute materials that are somewhat more flammable than askarel; and

6. To formulate policy dealing with manufacturers' liabilities under warranty.

Recognizing the importance of these timing and communication problems, we feel that real progress in solving them can only be made:

1. By there being a definite date for stopping the sale or purchase of askarels for new transformers;

2. By EPA establishing a definite, later date, for the cut-off of sale of askarels to transformer service and repair shops; and

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3. By EPA broadly disseminating at the proper time, a comprehensive analysis of the PCB ban, including alternative or remedial procedures, to all architects, construction consultants, federal, state, and local governmental agencies, transformer manufacturers, service shops, utilities, fire underwriters, professional technical organizations, and others. This analysis should specifically spell out the timing on a ban, its restrictions, and its alternatives; and most importantly, there should be precise definitions of terms, such as "use", "transport", "process", "distribute in commerce", and other similar terms.

We recognize the fact that the timing aspects of the PCB ban are spelled out in the proposed "Toxic Substances Control Act, S-3149"; and we feel that we can effect an orderly withdrawal of PCB's within this time frame. In summary, it should be noted that askarel-filled transformers represent perhaps less than 5% of the dollar value of the total transformers sold; and because of this and the fact that other types of transformers will be made in lieu of askarel transformers, we do not see any undue hardship resulting from an intelligently planned and implemented total ban on the usage of PCB's.

We, as responsible members of the business community, share the concerns of everyone regarding environmental hazards; and we pledge our wholehearted support in helping solve the PCB problem.

MONS 219037

Clifford Tuttle
Capacitor Manufacturers Task Force
Electronic Industries Association

May 13, 1976

Mr. Train, my name is Clifford Tuttle, I am president of Aerovox Industries and I am speaking under the auspices of the the Electronic Industries Association for the manufacturers of alternating current (AC) capacitors on polychlorinated biphenyls. Perhaps it would be illuminating if I briefly outlined the market and function of an AC capacitor.

The total capacitor market in the U.S. is approximately $600 million of which the Department of Commerce reports only $500 million since some AC segments of the market do not fall under a capacitor SIC code. Of this $600 million, $450 million is direct current (DC), primarily electronic. We are only associated with the AC sector which totals approximately $150 million. This can roughly be divided into three equal parts: $50 million of large (utility type) capacitors, $50 million of lighting (small) capacitors, and $50 million of motor run and other small capacitor applications.

Frequently, people not connected with the industry try to make comparisons between the use of AC capacitors in the U.S. and the practices followed in other countries. This is not possible since the U.S. is relatively unique. In many countries, the distribution circuits are 220 volts and capacitors are applied across the incoming voltage, providing power factor correction only. In the U.S. we use a 110 volt system, but we put our capacitor in the circuit with a transformer or a motor winding to gain significantly greater efficiency and use less current. The result is that U.S. capacitors see voltages of from 300-500 volts versus the 220-250 volts typical in other countries.

As a result of these higher voltages and the resultant corona, we do not believe that the referred to "dry construction" - metallized film - will be a viable method of manufacturing AC capacitors until the 1980's and still then only for a segment of the market. Presently, this process and resultant product is simply too unreliable and much must be done to improve performance before dry designs will satisfy U.S. requirements; therefore, for the remainder of this decade, we feel paper/foil capacitors, with some type of impregnant, are the only way that we can supply the needed AC capacitors in the U.S.

Without capacitors, our fluorescent and mercury lights would require nearly twice as much electric power for the same light output. The same is true for AC motors and, in the case of most air conditioning compressors, the units would not even operate on the 110 volt line current without capacitors. The present use in the

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U.S. of an AC capacitor in television is primarily for the benefit of the consumer in that the constant voltage transformer insures that the picture size will not decrease with changes in line voltages. It also significantly reduces the amount of current needed for television sets, but this is not the reason the capacitor is currently being installed in about 25% of the U.S. sets.

Looking forward to 1980, TV sets will undoubtedly have to have capacitors since the Federal Energy Policy and Conservation Act mandates energy consumption reduction on virtually all appliances and other items that are significant users of electricity. For example, room air conditioners now use shaded pole motors on the fans; these must change to split capacitor motors in order to meet this mandated reduction. We believe that compliance with this recently passed legislation will increase by 1980 the small capacitor market in the U.S. from its present $100 million to between $150 million and $175 million in terms of today's dollar.

I just learned yesterday that the State of California is holding hearings on legislation that would immediately require the addition of capacitors on virtually every appliance.

Now that we have identified the function and market for an AC capacitor, let me bring you up to date on our progress in searching for alternate liquid impregnants to replace Aroclor 1016. At present, it appears that manufacturers of small capacitors may generally employ phthalate esters which are less efficient than PCB's. There is some concern about a segment of the applications of these products where operating temperatures are in the 85°C to 100°C range. The manufacturers of large utility type capacitors do not have unanimity in the selection of alternate materials. Some are going to phthalate esters, others hydrocarbons and a few to entirely different materials. Both types of manufacturers will probably be able to meet a 24-30 month phase-out which provides a very limited amount of time for testing and customer acceptance. The transition is going to pose a special hardship on about half of the manufacturers of small capacitors who had hoped to use a modified hydrocarbon that was being proposed by Monsanto. The availability of this fluid has been withdrawn and therefore these companies are starting today from ground zero on phthalate ester research. There are other problems associated with the transition. First, I must emphasize that in a short period of two years we have to change from a material on which we have a 40 year history to brand new untried alternates. There are many risks involved because we may be unsuccessful. Therefore, the product liability that rests upon us, as manufacturers, is most significant. Secondly, there is no doubt that the product made with alternate materials will have a somewhat poorer performance and be significantly less reliable than those made with Aroclor 1016. Also, we are still concerned about the environmental acceptability of these alternates and hope we are not trading one problem for another. Finally, and most important, all of these alternates are flammable, posing a significant safety hazard to both life and property. We do have methods

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of protection available, but unfortunately they are most unreliable. All the user groups with which we met are practically paranoiac about this problem.

Now I would like to address myself to EPA's directive efforts to force those of us discharging to streams to hold effluents to one part per billion. We do not believe that pretreatment has been proven technically and the cost appears to be extremely high. Further, we are having even greater difficulty in responding to EPA pressure that discharges to municipal sewers be low. Here, we apparently must treat the raw sewage before we can even start the treatment for PCB's. This is going to be very expensive and again, the end results are unknown. Frankly, we are concerned that the cost will be prohibitive to many of the capacitor manufacturers. We think, during this last 2 year phase-out period, maximum discharges of 1-3 ounces per day, per plant and 4 pounds a day for the entire industry is acceptable. By your own admission, this is an infinitesimal amount compared to the PCB's going into the environment by other means. We question the edict to go lower than 1-3 ounces per day when we know that from the date in which pretreatment could be installed we will probably use PCB's for only 6-12 months. Therefore, it appears the necessity for this significant expenditure will be removed almost immediately after it is made. We hope that EPA will understand our position on this matter.

In summary, phasing out the use of Aroclor 1016 in 24-30 months forces the manufacturers of AC capacitors to take major risks from a consumer safety and a product liability standpoint. We will be making the transition with totally insufficient experience. Let me review our major concerns.

1. The modified product would be considerably less reliable;

2. The new product will be more costly;

3. The new product will be larger;

4. We do not know the environmental impact of the alternate materials;

5. Finally, and most important, any known alternative material will be flammable and a potential hazard to people and property. We hope the U.S. Government is truly facing the potential magnitude of this problem.

As you can see, Mr. Train, we sincerely question the advisability of ceasing the use of Aroclor 1016 and changing to flammable alternatives. Perhaps, considering all aspects, controlled use of Arochlor 1016 in capacitors would be better.

MONS 219040

Harry Onishi
Utilities Task Force

May 13, 1976

PROGRESS ON PCB CONTROL

Mr. Train, as a result of your meeting with representatives of the electric utility industry in January concerning the problem of PCB's, a Task Force has been formed under the auspices of the Edison Electric Institute to focus voluntary action of the utility industry in cooperation with EPA in controlling the handling and disposal of PCB's.

The Task Force has had several meetings with EPA representatives and we have prepared an Industry Position Statement. Copies of this statement are available and have been released to your staff. Today, I would like to briefly summarize our concerns with the phase-out of PCB's and the use of substitute fluids in electrical equipment.

Looking first at existing equipment (which are primarily transformers and power capacitors), we believe such equipment should remain in service for its useful life. Our reasons for this position are as follows:

1. Past experience has shown that transformers and capacitors are very reliable devices. During normal operation of this equipment, PCB losses to the environment have been minimal. I might mention that this finding is also supported by the Independent Study (PCB's in the United States Industrial and Environmental Distribution) conducted for EPA.

2. It is not possible to completely drain equipment of all PCB's. If we attempted to retrofill transformers, the substitute fluids would be contaminated with PCB's and the transformer would still have to be handled as PCB containing apparatus. For capacitors, the units are hermetically sealed with no provisions for adding or removing fluid.

3. Substitution of non-PCB fluids in existing equipment would create severe handling, transportation and disposal problems. For example, for disposal of PCB's, there are limited facilities for incineration, and there are a limited number of chemically secure landfill sites for disposal of non-burnable PCB wastes and equipment. Moreover, we believe undertaking such a program would significantly increase the probability of PCB releases to the environment.

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4. If it were required that all PCB containing equipment be replaced in total, there would be a tremendous replacement cost, insurmountable disposal problems, and we believe such a move could also impair the quality of electric service.

For these reasons we believe existing PCB containing equipment should remain in service and that our efforts should be directed toward maintaining records of all PCB equipment and establishing procedures and methods for the containment, clean-up, handling, and disposal of PCB's in accordance with guidelines as stated in the ANSI Standard C-107. You may be interested in knowing that utilities are disposing of PCB's by incineration and in approved landfill sites. As I mentioned previously, there are at present a very limited number of chemically secure landfill sites. Geographically they are located in California, Idaho, Nevada, Texas, New York, and Illinois. Because of this limitation, in some instances, utilities are stockpiling capacitor units until suitable disposal arrangements can be made. Utilities are also in the process of developing and implementing procedures for control and proper clean-up of inadvertent PCB spills should they occur.

We expect that PCB containing equipment will be part of electric utility systems for many years into the future. Phase-out of the manufacture of PCB's would not impact existing capacitor installations because there are no make-up fluid requirements. It would require, however, that acceptable substitute capacitor fluids for replacement units be available. For existing transformers, unavailability of PCB's would be an inconvenience, but the nominal make-up fluid requirements could be provided by reclaiming askarel from transformers removed from service.

Moving on to replacement and new equipment, there are numerous proposed substitute fluids; however, there are today no direct replacement fluids that have the equivalent properties of askarel. We note in pending legislation that the proposed timetable for phase-out of PCB use in electrical equipment is 2 1/2 years. We think this is overly optimistic. We believe further research, development, demonstration and evaluation are necessary to determine long term electrical characteristics and operating reliability. It is also important that we have EPA assurance that the substitute fluids are environmentally acceptable so that normal handling and disposal methods may be employed.

For transformers, we believe further testing is required to establish that substitute fluids do not constitute an undue fire risk and further, the appropriate code-making agencies must indicate they are acceptable from a fire risk standpoint. On new transformer installations, utilities are taking steps to minimize or eliminate requirements for PCB transformers by using alternative designs where practicable. However, for replacement units at existing locations, there may be no feasible alternatives. At some

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locations it is essential that replacement transformers have a fire-resistant insulapion. Based on the development, testing, and evaluation still remaining, we believe the phase-out of PCB use in transformers will be in the range of 5 years, rather than 2 1/2 years.

For power capacitors, it appears substitute fluids having adequate insulating properties are available; however, no adequate assessment of their operating performance or reliability has been made. Assuming these fluids are environmentally acceptable, and there are no other unforeseen difficulties, the phase-out of PCB use in capacitors could be accomplished within 3 years.

In conclusion, the utility industry is concerned that PCB's are properly controlled and we are prepared to take practical measures to ensure that PCB's from electrical equipment do not enter the environment. We are pleased that we have the opportunity of working with EPA in moving toward a voluntary solution to this difficult problem. In view of the progress on control of PCB's and the intention of utilities to conform with provisions of ANSI C-107, we believe it is unnecessary to specifically legislate the control of PCB's such as is proposed by the Nelson Amendment. We would urge that this be a significant consideration in your discussions with Congress on PCB legislation.

MONS 219043

L. C. Weber
Monsanto Chemical Company

May 13, 1976

Good afternoon, my name is Cole Weber. I am manager of product acceptability for specialty chemicals, including polychlorinated biphenyls (PCB) dielectric fluids, manufactured by Monsanto Industrial Chemicals Company, a unit of Monsanto Company.

When Jack Fitzgerald, a Monsanto vice president and managing director of this operating unit, met with you in January, he assured you that Monsanto had no desire to remain in the PCB business any longer than necessary. He also stated that as soon as Monsanto was satisfied that the electrical power supply industry's needs for usable, acceptable alternate dielectric fluids had been met by whomever, Monsanto would voluntarily shut down its PCB manufacturing unit.

I am here today representing Monsanto to reaffirm this position and to give you a brief update on the status of development work on possible replacement products. I'll also comment on the phase-out timetable.

Based on customer feedback, the transformer industry is apparently leaning towards silicones, which are readily available, as the leading askarel (PCB) replacement candidate. We do, however, still sense some reservations on the part of our transformer customers with regard to the fire resistance of all current replacement candidates and are awaiting further clarification programs.

In the meantime, we have shelved all development work on our transformer fluid alternates because they simply did not appear to be able to compete on a cost/performance basis with other viable alternates.

In the capacitor segment, the trend is currently towards commodity type solutions which are widely available in large quantities such as phthalate esters. If this approach proves satisfactory, it will obviously preclude further consideration of specialty solutions such as Monsanto's MCS 1238-type technology which is a proprietary blend specially designed as a capacitor dielectric. Consequently, we are very close to terminating our development efforts in this area as well.

If the capacitor industry determines that commodity fluids are indeed the most expedient way to satisfy their cost/performance criteria, we believe that Monsanto may have viable candidates to assist them in this approach.

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Regarding the phase-out timetable, we are already involved in the transformer fluid phase-out. Since we announced our intentions to exit the business, demand for PCB-filled transformers has declined substantially. Our transformer fluid sales in 1976 will be less than half the toal recorded in 1975.

When the capacitor makers complete their evaluation work and tell us they are satisfied that they have viable alternates in hand, we will cooperate fully in an industry-wide changeover and proceed with the orderly termination of all PCB production, including Aroclor 1016, the current capacitor industry standard.

Monsanto is often asked, and indeed pressed, to establish a firm exit date. We are as anxious as anyone to settle on a firm timetable so we can complete our exit plan and begin applying these considerable resources to ongoing programs. However, to unilaterally set an exit date would be inconsistent with our long-standing pledge to work with the electrical industry to replace PCB's in an orderly manner. So, to reiterate, Monsanto is fully prepared and indeed most anxious to exit this business at the earliest possible date. We will establish and begin executing a firm phase-out timetable as soon as we receive a consensus judgement that viable alternates are in hand.

Thank you.

MONS 219045

Ronald J. Kasper
Industrial Risk Insurers

May 13, 1976

CURRENT POSITION OF THE INDUSTRIAL RISK INSURERS REGARDING THE USES OF PCB's IN ELECTRICAL SYSTEMS

It has been common practice to use askarel-insulated transformers as one of the counter measures against the fire and explosion hazards of oil-insulated transformers. Recently, however, recognition of the environmental hazards of askarels (polychlorinated biphenyls or PCB's) has become a matter of concern to many. As a result, this Association is reevaluating the suitability of askarel-insulated transformers.

As an industrial property insurer, we are interested in the development by industry and/or government agencies of substitutes for askarels that are satisfactory from a fire protection standpoint. Otherwise it may be necessary that we evaluate installations to determine if additional fire protection is needed. Oftentimes, automatic deluge waterspray systems, fire barrier walls, fire resistive vaults, or combinations thereof are recommended to protect buildings, adjacent transformers, and outdoor storage where combustible liquid-immersed units introduce exposures.

Currently, silicone oils are being considered as one substitute for askarels in transformers. Although our experience with silicone oils is limited, their use has been accepted by us on a limited case-by-case basis. Hopefully, additional research, testing, and service experience will eventually demonstrate that silicone oils as well as some other dielectrics are acceptable substitutes for askarels in transformers.

Although silicone oils have shown considerable promise for use in transformers, this does not currently appear to be the case for their use in capacitors. Other dielectrics are currently in the developmental stage and will be tested for suitability. Hopefully, researchers will soon be able to agree on a number of dielectric fluids for use in capacitors that are relatively non-combustible and equivalent electrically to the PCB's.

In summary, having recognized the adverse ecological and toxicological problems associated with PCB's and the impact of current EPA regulations, this Association urges that precautionary measures be developed to reduce the potential hazards of existing installations and utilized until such time as the availability of suitable substitutes having low orders of combustibility makes it possible to eliminate PCB's from our environment.

MONS 219046

Arthur Spiegelman
American Insurance Association

May 13, 1976

My name is Arthur Spiegelman. I am the Vice President for Engineering and Safety in the American Insurance Association. I am a registered professional engineer in the State of New York and and have graduated from the The Cooper Union with a Bachelor of Science Degree in Chemical Engineering. During the past 31 years I have been associated with the insurance industry in positions such as Director of Research, Manager of Engineering and now in my present position.

The PCB's or polychlorinated biphenyls came to our attention in the early 1950's as a fire retardant substitute for oil insulated transformers. At that time, this fire problem was important to our industry. A preliminary survey of our industry indicates that there was a decrease in this hazard after the PCB's (or askarels) were introduced.

The insurance industry has an overall interest in the total loss control aspects of multi-faceted hazards. In this sense, the PCB's fit into the category of a product which alleviates a serious fire hazard but produces an environmental hazard of major proportions. I am submitting to you a copy of our latest publication on this subject, Chemical Hazard Bulletin C-17 Polychlorinated Biphenyls (April 1976). This publication will serve to acquaint you with the extent of our concerns and also indicates he Loss Control measures which we advocate.

In this publication, we have not addressed the two problems facing the EPA at this point of time:

1. The implications of prohibiting further production of PCB's; and

2. The implications of outlawing their use within a period of 2 1/2 years.

It was my understanding that you wished us to discuss these questions from the standpoint of the economic impact on our industry and on those of our insureds.

A prohibition of further production of PCB's appears to be inevitable. The preponderous evidence as to the toxicity and the apparent environmental problems would certainly cause you to act in this direction. From a fire protection standpoint, this will require some readjustments. It would be easier for us to make the changes if we had an acceptable substitute for the PCB's. However, those materials which have been suggested to date, such as --

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Diisonyl Phthalate, Dichlorobiphenyl (plus alpaline Derivative), Polydimethyl Siloxane, and Butylated Monochlorodiphenyl Oxide have all been tried. There seems to be some problems associated with each product and we would have to adjust our thinking to the degree and type of problem which each one presents.

For instance, if the fire hazard were increased through the use of a substitute material in the transformers, it might require relocation of the transformers and the use of fire resistive enclosures and water spray protection systems. All of this would be an additional expense and in some cases provide difficulties in finding acceptable space to locate the redesigned transformers. How many of the 125,000 transformers would require this treatment? How much money would be involved? All of these questions and others cannot be evaluated until we know what substitute material has been selected and to what degree the fire protection will be changed.

The second question which involves the time period for outlawing the use of PCB's is one which involves a serious financial responsibility on your part. The removal of the PCB's from the existing 125,000 transformers and the changing of 780 million capacitors places a burden on the users of this equipment which could run into many millions of dollars. To this must be added the cost of discreet and safe waste disposal of the existing PCB's. This will require an educational program of major proportions.

We in the insurance industry will cooperate with you in informing our insureds of your decisions in this matter. We are interested in producing a safe and healthy environment. The target dates depend on the availability of a substitute for the PCB's and the practical aspects of changing the materials and equipment.

MONS 219048

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16 ABSTRACT

Statements presented by representative manufacturers and users of PCB's and PCB containing products at meetings with the EPA Administrator have been compiled. Industry outlines its plans for discontinuing the use of PCB's, but presents summarizations of the problems with the phasing out of capacitor and transformer manufacture. The report represents a consultative step in meeting the EPA goal of banning the use of PCB's in all new products.

17 KEY WORDS AND DOCUMENT ANALYSIS

a DESCRIPTORS	b IDENTIFIERS/OPEN-ENDED TERMS	c COSATI Field/Group
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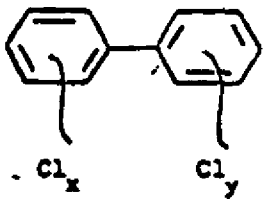
Why are Polychlorinated Biphenyls (PCBs) needed?

The principle use of PCB fluid in the electrical industry is in transformers and capacitors (both large and small) as an insulator and coolant. At the present time there is only one domestic manufacturer of this fluid - Monsanto Chemical Company, calling its product Aroclor. Westinghouse uses the tradename Inerteen and General Electric uses the name Pyranol. Throughout the transformer and capacitor industries it is generically known as an Askarel fluid. Whatever the name, this family of insulants is characterized by stability - high flash points and even higher combustion temperatures essential to safe operation.

PCB's, Aroclors, are essential as dielectric fluids for capacitors and transformers. They have been used for about forty years. They possess a unique combination of physical and chemical properties which allow these devices to operate at high voltages and high power levels, for long periods of time, under extremely varying conditions, and with reliability and safety.

A brief description of the Aroclors is warranted to explain their usefulness as an electrical insulator. An Aroclor consists of a mixture of variously chlorinated biphenyls, according to the formula:



$x + y = 1, 2, 3, 4, 5,$ or 6
(some 7, 8, 9, 10)

with isomers of each chlorination level. All the bonds in these molecules are covalent. They are particularly strong, being aromatic carbon-carbon, carbon-hydrogen, and carbon-chlorine bonds. Table 1 lists some of the compositions of liquid chlorinated biphenyls.

Table 1

Composition of Different Liquid Chlorinated Biphenyls

Components - given as % -	Monsanto Aroclors							
	1221	1232	MCS 1043	1242	MCS 1016	1248	1254	1260
Chlorine	21	32	32	42	42	48	54	60
Biphenyl	14.8		.04	.02	.02			
Mono-chlorobiphenyl	56.5		22.2	.72	.93			
Di-chlorobiphenyl	26.9	~55	74.4	15.6	19.4			
Tri-chlorobiphenyl	1.42		3.3	54.5	64.5			
Tetra-chlorobiphenyl	.05			22.5	15.0	~55		
Penta-chlorobiphenyl				6.7*	.16*		60	
Hexa-chlorobiphenyl								70

*Includes higher than penta-chlorinated isomers.

Because of their bond covalency and strengths, Aroclors have a high degree of thermal stability and chemical inertness, and they do not undergo ionic dissociation. These properties give to Aroclors, with respect to their use in electrical power devices:

(1) high voltage capability
(2) good insulating quality (very low electrical conductivity)
(3) high thermal stability, and
(4) compatibility with various solid dielectric and metallic components of capacitors and transformers.

The chlorine atoms of Aroclors are specifically beneficial in three ways, because they give:

(5) a relatively high dielectric constant, ϵ'_r = 4.0-5.8 which is particularly useful for capacitors.
(6) good corona properties (since most of the products of corona discharge are chlorinated and are readily absorbed by the dielectric, or reacted with relatively little inert gas that remains as bubbles and sustains corona - so they may be subjected to sporadic overvoltages.
(7) the property non-flammability (won't support combustion by itself), which occurs at 42% chlorination and above (Aroclor 1242 or MCS 1016, average x + y = 3); thereby the devices with which they are used will not support combustion.

Aroclors to 62% chlorination are liquids because of their mixed molecular composition, the isolated individual isomers being crystalline with relatively high melting points. This effect, to prevent crystallization (an effect which would cause loss of electric strength), extends to low temperatures, where they go gradually into a glassy state. Therefore, they

(8) are effective over a broad temperature range, from as low as -60° C to 150° C. (where their vapor pressures are still relatively low).

No other insulating fluid is known that equals the Aroclors, with respect to all these eight properties. It is especially

difficult, or impossible, to find another fluid that is non-flammable, having even just adequate thermal and electrical characteristics for power capacitors and transformers. A replacement for Aroclor is almost bound to present a fire hazard as can be seen from Table 2 (Underwriter Laboratory Flammability Rating) and Table 3 (Alternative Insulating Fluids).

Table 2

Underwriter Laboratory Flammability Rating

Fluid	Flammability Rating
Ether	100
Gasoline	90-100
Ethyl Alcohol	60- 70
Kerosene (100° F.P.)	30- 40
Paraffin Oil	10- 20
Aroclor 1242 and 1016	2- 3

As for capacitors, the most practical substitute for PCB presently known is mineral oil. Use of mineral oil impregnated kraft paper capacitors was pioneered by Westinghouse from 1924-1932.

Introduction of PCBs in capacitors in 1934 resulted in drastic reduction in fire and explosion hazards and greatly increased safety to operating and maintenance personnel as well as the public. Size and cost were reduced commensurately. Further advancement resulted from the introduction of polypropylene film-paper-PCB capacitors in 1967.

Reverting to an oil-paper dielectric system would increase the average capacitor volume (size) by approximately 600%, the weight by 500% and the cost by approximately 400%. At the present levels of demand for capacitor kvac, there would be a shortage of electrical grade papers and a shortage of capacitor factory facilities further tending to increase the cost to the utility, and ultimately to the consumer.

MONS 219053

Table 3

Alternate Insulating Fluids

Some Significant Properties of Certain Candidate Insulating Fluids to Replace Aroclor 1242

Fluid	Dielectric Constant, ϵ'_r, at 100° C	Cleveland Open Cup Flammability Flash Point - °C - Fire Point		Density	Cost, ¢/lb
Aroclor 1242	[illegible]	194	333	1.39	18
Aroclor [illegible] 2016	4.9	191	319	1.36	19
Aroclor [illegible] 1043 (lower chlorinated diphenyl)	4.8	160	244	1.28	[illegible]
Wemco C Oil (Mineral Oil	2.1	145	150	.9	3

MONS 219054

Table 3

Alternate Insulating Fluids

Some Significant Properties of Certain Candidate Insulating Fluids to Replace Aroclor 1242

Fluid	Dielectric Constant, ϵ'_r, at 100° C	Cleveland Open Cup Flammability Flash Point - °C - Fire Point		Density	Cost, ¢/lb
Aroclor 1242	[illegible]	194	333	1.38	18
Aroclor [illegible] 1016	4.9	191	319	1.36	18
Aroclor [illegible] 1243 (lower chlorinated diphenyl)	4.8	160	244	1.28	15
Wemco C Oil (Mineral Oil	2.1	145	150	.9	3

MONS 219055

Use of oil impregnated paper for capacitors has been largely abandoned throughout the world, in favor of one or the other of the PCB systems. The only significant manufacturer in the world is Japan. Even during the recent most unfavorable balance of trade with Japan, this product was never considered for export to the U.S. because of its cost (200-400% more) and because of the flammable rating of the impregnant.

MONS 219056

ADVERSE EFFECTS OF POLYCHLORINATED BIPHENYLS

Chlorinated biphenyls, PCBs, during the past two years have been included among possible pollutants of the ecology, in association with DDT's. This has raised the question about their continued use in the electrical industry, where they have been serving as insulating fluids for capacitors and transformers for almost forty years.

Chlorinated biphenyls were first identified in the environment along with DDT's and the controls on the levels set by the FDA are "Action Levels", which are the same as for DDT. They are not levels for which PCBs have shown to be harmful to mammals. See Table 4 for "Action Levels".

Table 4

Generally Permitted "Action" Levels of PCBs (same as those issued for DDT)

Medium	Parts per Million PCB Permitted
Water	.5
Butter fat	5.0
Milk	.2*
Fish	5.0
Eggs	.5

*for 4% butter fat.

Tests by Monsanto and others of chlorinated biphenyls, PCBs, in the environment have shown a concentration of higher chlorinated compounds and a reduced or no presence of compounds with three chlorines or less.

Chlorinated biphenyls are considered about 1/10 as toxic as DDT for mammals. White rats fed up to 100 ppm of PCBs in their food steadily over a period of 24 months were healthy (See Table 5 for accumulative level). Dogs fed up to 100 ppm of the PCBs over 24 months showed a slowed weight gain with the higher chlorinated compounds, but not with

MONS 219057

the Aroclor 1242 (See Table 6 for accumulative level). There were no deaths. The higher chlorinated compounds accumulated in their fatty tissue to an equilibrium level.

are reported to
Chlorinated biphenyls affect the egg shell and hatchability of some birds. Other breeds of birds have not shown any effects. Birds are more susceptible to the lower chlorinated compounds, di and tri chlorinated. Three ppm of PCB in chicken feed affects the hatchability of Leghorn chickens, but not some other breeds of chicken.

One incident of ingestion of PCBs by humans has been reported from Japan. In this case, a rice oil with 2000 ppm of PCBs was consumed by 1000 people. Severe cases of chloracne, nausea, headaches, and weakness were experienced. Some babies of these people were born with brown pigmented skin, but the pigmentation later disappeared. There were no deaths. It is suspected that the PCB involved contained a chlorinated dibenzofurane, a toxic impurity found in some European chlorinated diphenyls.

Artifically controlled studies of biodegradation using a semi-continuous activated sludge test, SCAS, and also single bacteria culture tests have shown that the lower chlorinated compounds are biodegraded, but the rate of biodegradation decreases as the percent chlorination increases, and is very low for pentachloro compounds and higher (See Table 7 for results of these tests). Monsanto scientists state that they do not know the correlation of these artificial biodegradation tests to environmental conditions.

Chlorinated biphenyls appear to diffuse very slowly through soil.

Monsanto feels that their new grade of chlorinated biphenyl, MCS 1016, is biodegradable, since it contains only 0.16% of penta and higher chlorinated biphenyls. They recommend its use over 1242, which contains 6.7% penta-chlorobiphenyl, for capacitors or wherever the waste material is not strictly controlled.

TABLE 5

"Storage" of Chlorinated Biphenyls in Albino Rats, After 24 Months' Exposure in Feed

Note: Concentration in lipid became approximately constant at about 6-12 months; except for Aroclor 1254 and 1260 exposures at higher concentrations, noted by *, where it tended to increase continuously with time, and the liver to brain weight ratio increased.

Aroclor - in Feed	Concentration in Lipid, ppm, at 1	10	100	ppm in feed
1242	10	70	200	
1254	50	200	1,500*	
1260	?	?	5,000-10,000*	

TABLE 6

"Storage" of Chlorinated Biphenyls in Dogs, After 2 Months' Exposure in Feed

Aroclor - in Feed	Concentration in Lipid, ppm, at 1	10	100	ppm in feed
1242	3	5	6	
1254	6	18	109*	
1260	13	86*	579*	

* reduced weight gain, increase in liver to brain weight ratio

MONS 219059

Table 7

Biodegradability of Different Chlorinated Biphenyls

- Semi Continuous Activated Sludge Test, 2×10^8 cells/cc -
(observations after preconditioning sludge to Aroclor tested)

Aroclor	% Chlorine	% Disappearance in 48 hrs
Mono-chlorobiphenyl	18.5	100
1221	21	88
MCS 1043	30	55
MCS 1016	41	35*
1242	42	25
Distillate of MCS 1016	51	15
1254		15
DDT		<10
Linear Alkyl Sulfonate-Standard		100

* Noted concentrating of 4-, 5-, and 6- chlorinated isomers

- Single Cultures, C-2 and C-3, with specific isomers (Europe). -
Both cultures have approximately the same effect.

Chlorinated Biphenyl	Time for 50% Disappearance
di and tri	~26 days
tetra	~30 days

MONS 219060

Where are we today?

In the past twelve years 611 million pounds of Aroclors have been used by U.S. industry in their products (See Table 8 for details). 231 million pounds have been used in products that may be classified as open systems, i.e. paint formulations, plasticizers, hydraulic fluids, and semi-closed systems such as heat exchangers. During this same period of time the electrical industry used 380 million pounds of the Aroclors in closed systems which are essentially capacitors and transformers. In the electrical industry the Aroclors are confined to equipment where the containers are sealed and the system is considered to have a "closed" cycle.

An estimate of the total Aroclor used in the U.S. in closed system electrical usage since 1934 is about 690 million pounds. The closed systems can be broken into two categories estimated at 440 million pounds for capacitors and 250 million pounds for transformers. Most of this 690 million pounds is still in use in closed systems today. Some of this amount has escaped into the environment, and this will be analyzed a little later, but the major impact on the environment has been through open system usage, or semi-closed system usage (heat exchangers).

The ratio of usage in open systems to usage in closed systems over the past twelve years was 61%. Using a conservative ratio of 30% for the earlier years, 1934-1950, would add approximately 53 million pounds in open systems prior to 1950 for a total to date in open systems of 324 million pounds maximum compared to 690 million pounds in closed electrical systems.

Calculations show that the amount of Aroclor that has possibly escaped from the closed electrical systems is small. Based upon worst case failure modes and failure rates a maximum of .025% or 110,000 lbs. from

MONS 219061

capacitor failures and a maximum of .040% or 101,250 lbs. from transformer failures could have been introduced into the environment since 1934. This amount when compared to total introduced by open systems is very small $\frac{211,250}{324,000,000}$ or 0.06%.

Looking at the most recent electrical usage figures (Reference Table 7) and projecting ahead, the maximum amount of leakage that could be expected from continuing use of Aroclors in closed electrical systems would be 0.03% or 9,000 lbs. per year assuming no increase in precautions, handling, procedures, etc. This amount when compared to what is already in the environment is very small $\frac{9,000}{324,211,250}$ or .003%.

Table 8

Monsanto Production and Sales of Aroclors for 1960-1971, with Breakdown Showing Electrical Usage
(from GE Hess, December 6, 1971)

	U.S. Production	Domestic Sales: Insulating Liquids[a]	Domestic Sales: Others[b]	Exports
Figures in short tons				
1960	20,786	12,444	5,163	1827
1961	20,333	11,108	7,661	2076
1962	20,906	11,683	7,339	1809
1963	22,367	11,448	7,618	1824
1964	25,417	13,769	8,666	2048
1965	30,240	16,203	9,695	2117
1966	32,925	18,897	10,642	3426
1967	37,655	20,307	10,846	4062
1968	41,427	20,568	11,990	5312
1969	38,194	18,564	15,034	5312
1970	42,527	20,268	16,263	6826
1971[c]	20,236	14,417	4,401	4938

[a] For closed electrical systems - transformers and capacitors.

[b] Includes heat-transfer systems, hydraulics/lubricants, and plasticizers.

[c] Estimated.

Source: Monsanto

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Existing Controls

Monsanto has already taken the following actions:

(a) Stopped sales to "open" users (paint formulators, plasticizers, hydraulic fluid manufacturers, etc.)

(b) Stopped sales for use in heat exchangers - particularly food processors.

(c) Alerted all recipient manufacturers to exercise care in use of fluids.

(d) Provided for waste fluids incineration.

(e) Modified capacitor fluids, eliminating the more highly chlorinated and environmentally more objectionable fractions.

All of these actions have greatly improved the control of PCBs to prevent future environmental damage by eliminating future open system usage which has provided over 99% of PCBs introduced into the environment.

The electrical industry is aware and has been alerted to the environmentally hazardous nature of PCBs. The industry in general exercises high standards of control as it incorporates the fluid into its capacitors and transformers. Safe Practice Procedures for use and handling of PCBs have been in use for many years. The recent (1966) knowledge of PCBs being possible environmental hazards has resulted in warnings and special instructions to customers and handling personnel about the hazardous nature of PCBs. In addition, when sealed systems containing PCB must be opened and drained for repairs, the instructions call for collection of all waste liquid PCB and contaminated materials for special destructive incineration.

Recommendations

Although the electrical industry has recognized and is implementing control systems to decrease the amount of PCBs entering the environment from its handling and use, it supports federal legislation designed to protect the environment. The industry is working with ANSI and other standard organizations to prepare high standards for the use, handling, and disposal of PCBs, however, it is vitally concerned that PCBs not be pre-emptorily banned from manufacture and use in closed electrical systems, since it is felt that the public can be adequately protected without such action, and there are other hazards, particularly fire, associated with known substitute material.

ANSI C-107 committee on the use and disposal of PCBs in electrical equipment is working on a plan to control PCBs. The development of this plan in conjunction with Federal legislation and regulation of the manufacture, use, and disposal of PCBs should bring the PCB situation to a point where regulated electrical industry usage can represent no more threat to the environment than that for numerous other necessary and beneficial materials likewise requiring precautions in use, distribution, and disposal.

E.R. Boquist
1/3/72

MONS 219065

Activated Sludge Primary Biodegradation of Polychlorinated Biphenyls

by E. Scott Tucker, Victor W. Saeger and Orville Hicks

Monsanto Company
St. Louis, Mo 63166
March 28, 1975

Since the identification of polychlorinated biphenyl (PCB) residues in the environment in Sweden (Jensen, 1966) an effort has been made to determine the level and distribution of these materials as well as their effects upon living organisms. The widespread distribution of low but detectable levels of some PCBs in the environment is now well documented and a substantial amount of data have been accumulated regarding their acute, subacute, and chronic toxicity (Peakall and Lincer, 1971; Edwards, 1970).

While much is known about the effects of PCBs on living organisms, there is relatively little information available regarding the effects that living organisms have upon PCBs, i.e. their biodegradability.

The biodegradability or susceptibility of an organic compound to biological degradation, especially by bacteria, is a prime determinant of its environmental residence time. The finding of PCB residues in the environment suggests to many that PCBs as a class of compounds are resistant to microbial degradation. However, in order to fairly evaluate the persistence of PCBs it must be understood that PCBs are not a single entity, but complex mixtures made up of many entities which may undergo biological degradation at different rates.

Chlorinated biphenyls are commercially produced by the direct chlorination of biphenyl. The resultant mixtures can theoretically have as many as 210 different components containing 0-10 chlorine atoms per biphenyl molecule. Of the possible isomers, 103 are considered most probable (Widmark, 1968). The complexity of the PCBs, therefore, complicates the determination of both environmental levels and their impact on the biota.

Environmental monitoring programs have demonstrated that, with the exception of direct high level controllable contamination near points of manufacture or use,

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1 – 4

Attachment 1 4

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the PCBs generally found in the environment are the more highly chlorinated biphenyls, i.e., those containing 5 or more chlorine atoms per biphenyl molecule (Jensen and Widmark, 1967, Holmes, et al, 1967; Koeman, et al, 1969). This is true even though the more highly chlorinated biphenyls constitute only about 35% of all the PCBs manufactured over the years (Monsanto Company, 1971). This is strong evidence that the less chlorinated materials degrade more rapidly than the more highly chlorinated ones. It also suggests that even under conditions of unrestricted use and without special precautions to prevent entry into the environment that the less chlorinated materials degraded rapidly enough to prevent accumulation.

It is obvious, therefore, that to obtain a more complete understanding of the environmental behavior of PCBs that information concerning their susceptibility to microbial degradation is needed.

It has been shown that biphenyl can be degraded by gram-negative bacteria through 2,3-dihydro -2,3-dihydroxybiphenyl, α-hydroxy-β-phenylmuconic semi-aldehyde and phenyl pyruvate (Lunt and Evans, 1970), and it has been reported that Pseudomonas putida oxidizes biphenyl through 2,3-dihydro - 2,3-dihydroxybiphenyl and benzoic acid (Catelani, et al, 1971). More recently Gibson and co-workers isolated a bacterium, tentatively identified as a Beijerinckia species from a polluted stream, capable of utilizing biphenyl as a sole source of carbon and energy for growth (Gibson, et al, 1973) and organisms capable of oxidizing biphenyl and p-chloro biphenyl have been shown to be widely distributed in the natural environment (Ohmori, et al, 1973).

Degradation studies have also been carried out on some selected PCB isomers with two species of Achromobacter isolated from sewage (Ahmed and Focht, 1973a,b) and with Aroclor 1242 (Kaiser and Wong, 1974). To date, no work has been reported on the biodegradation of commercial PCB mixtures by activated sludge.

In the study reported here, the susceptibility of commercial polychlorinated biphenyl mixtures to primary degradation by activated sludge microorganisms was investigated.

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METHODS AND MATERIALS

Polychlorinated Biphenyl Mixtures

The following polychlorinated biphenyl mixtures manufactured by Monsanto Company were studied. Aroclor[1] 1254, Aroclor 1242, Aroclor 1016, MCS 1043 (not a commercial mixture), and Aroclor 1221. In Table I, the typical per cent composition of the mixtures studied is given in terms of the number of chlorine atoms per biphenyl.

TABLE I
TYPICAL % COMPOSITION OF
POLYCHLORINATED BIPHENYL PRODUCTS*

# Cl Biphenyl	Aroclor 1221 (21% Cl)	MCS 1043 (30% Cl)	Aroclor 1016 (41% Cl)	Aroclor 1242 (42% Cl)	Aroclor 1254 (54% Cl)
0	11	0.1	<0.1	<0.1	<0.1
1	51	22	1	1	<0.1
2	32	72	20	16	<0.5
3	4	6	57	49	1
4	2	ND	21	25	21
5	<0.5	ND	1	8	48
6	ND	ND	<0.1	1	23
7	ND	ND	ND	<0.1	6
8	ND	ND	ND	ND	ND

*Per cent (w/w) by GC/Mass using area correction factors.

ND - None Detected, <0.01%

Biodegradation Method

The primary degradation rate of the PCB mixtures was determined using the Soap and Detergent Association semi-continuous activated sludge (SCAS) procedure and modified feed (S.D.A., 1965, 1969). The sludge unit used was a cylindrical glass chamber (85 mm O.D.) of 1500 ml working volume with provisions for aeration, magnetic stirring, sampling and draining. The activated sludge culture was obtained from a local municipal sewage treatment plant and acclimated on synthetic sewage (300 mg of glucose + 200 mg nutrient broth + 130 mg KH_2PO_4 per liter) for several weeks prior to the start of actual feeding of the polychlorinated biphenyl mixtures. The mixed liquor (sludge + aqueous phase)

[1]Registered trademark of Monsanto Company

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was initially adjusted in each sludge unit to a suspended solids concentration of about 2500 mg/liter and during the course of the tests readjusted to this value on a weekly basis.

Each cycle was initiated by the addition of synthetic sewage and the PCB being studied

Because of their low water solubility, the PCB mixtures being tested were fed via syringe injection of 200 µl of an ethanol solution. In this manner, homogeneous dispersions of the PCBs on the bacterial sludge were obtained.

After about 30 minutes of aeration, a 20 ml aliquot of the mixed liquor was withdrawn and analyzed for the PCB mixture in question. Aeration was continued until the end of the cycle when a second 20 ml sample of mixed liquor was withdrawn for analysis. At this point, the aeration was stopped and the sludge allowed to settle. After noting the sludge volume, two-thirds (1000 ml) of the supernatant was withdrawn and replaced with tap water. Monitoring of the sludge volume and supernatant pH provided some indication of satisfactory operation of the unit. The units were generally operated on two 48-hour and one 72-hour cycle per week.

Analytical Methods

The PCBs in the mixed liquor samples were isolated from the sample matrix by solvent extraction using either nenograde or spectrograde hexane. After concentrating in e Kuderna-Danish evaporative concentrator, the extracts were analyzed for PCBs by either electron-capture gas chromatography (EC/GC) or ultraviolet (UV) spectrophotometry. The UV analyses were made with a Cary Model 14 recording spectrophotometer and matched 2.0 cm quartz cells The gas chromatographic analyses were carried out with a Hewlett-Packard 5750 chromatograph equipped with a Ni^{63} electron-capture detector. A 2 m X 4 mm glass column packed with 4% XE-60 on 80/100 mesh Chromosorb W, H.P., was employed. The temperatures of the injection port, column and detector were 220°C, 170°-220°C, and 300°C, respectively. Calibration curves were prepared using standard solutions of the appropriate PCB mixture.

In Table II, the wavelength of the absorption maxima and absorptivities employed in the UV analyses are given. Aroclor 1254 did not have sufficient UV absorption for analytical purposes.

TABLE II
ULTRAVIOLET ABSORPTION AND RECOVERY DATA FOR BIPHENYL AND POLYCHLORINATED BIPHENYL MIXTURES

Material	λ Max ,nm	Absorptivity Liters/g-cm	Per Cent Recovery
Biphenyl	246	110.9	93 ± 3
Aroclor 1221	245	66.4	96 ± 1
MCS 1043	244	48.9	95 ± 1
Aroclor 1016	246	36.1	92 ± 1
Aroclor 1242	245	37.0	84 ± 1
Aroclor 1254*	-	-	76 ± 2

*Analyzed by EC/GC

In order to demonstrate the efficiency of the extraction procedure, samples of activated sludge were spiked in duplicate at two levels, 2.5 and 5 ppm, with each of the materials and then carried through the entire analytical procedure. The recovery data for each PCB fluid studied are given in Table II. No isomer distribution changes were observed upon comparison of the electron-capture chromatograms of the PCB reference materials to those of the spiked sludge extracts.

In order to show that the PCBswere not irreversibly adsorbed on and/or stored within the bacterial cells of the activated sludge and therefore not recovered via extraction, a sample of acclimated Aroclor 1016 mixed liquor was homogenized with a Polytron Soric Homogenizer to lyse the bacterial cells and then extracted A 100 ml sample of homogenized mixed liquor gave a PCB level of 0.51 mg compared to 0.58 mg for an identical mixed liquor sample treated in the normal manner.

RESULTS AND DISCUSSION

In Figure 1, the per cent degradation rates and 95% confidence limits obtained in this study are given for biphenyl and the PCB fluids. It is apparent from the plot of degradation rate vs weight per cent chlorine that the level of chlorination of the mixture is the most significant factor in the relative degradability of the PCBs.

The degradation rates reported here were obtained after the sludge units had been acclimated for about 5 months to the appropriate PCB. Initially the PCB mixtures were fed at a rate of 1 mg per 24-hour cycle, but because of the relatively slow rate of degradation observed in spot checks, the cycle time was increased to 48 hours.

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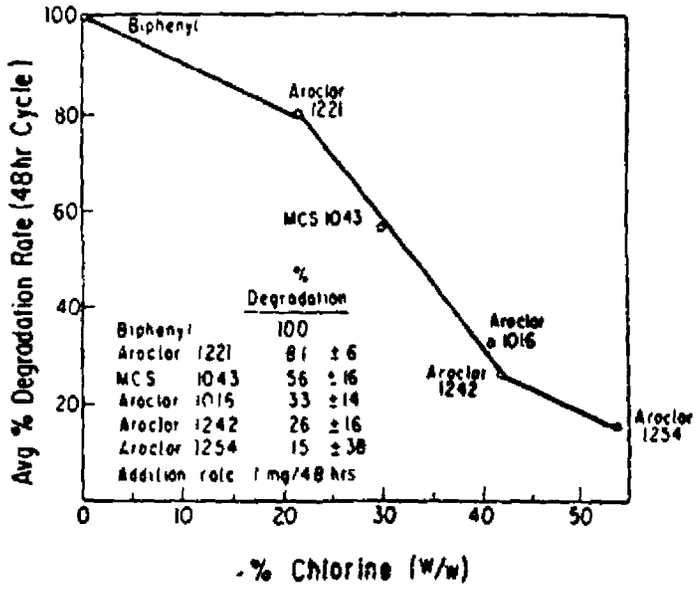

Figure 1. SCAS primary biodegradation rates of commercial PCBs as a function of the weight per cent chlorine.

Since Aroclor 1221 was found to be quite degradable, the effects of both time cycle and feed level were studied briefly. In Table III disappearance rate data obtained for 24 and 48-hour time cycles at 1 and 5 mg feed levels are given. It is apparent that for Aroclor 1221, most of the degradation occurs during the first 24 hours. This can be explained by the fact that the lower chlorinated biphenyls degrade more rapidly than the higher chlorinated biphenyls.

To verify that the disappearance of the PCBs was due precominantly to degradation and not to volatilization, off-gases from the Aroclor 1221, MCS 1043, and Aroclor 1016 units were passed through a train of three hexane scrubbers during several complete cycles. At the 0.1 cubic foot per hour aeration rate, the disappearance rates due to volatility were 4.2, 6.1, and 3.6% for Aroclor 1221, MCS 1043, and Aroclor 1016, respectively. These losses are well within the 95% confidence limits of the overall disappearance rates.

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TABLE III
EFFECT OF TIME CYCLE AND FEED LEVEL ON THE AROCLOR 1221 DISAPPEARANCE RATE

Feed Level	Disappearance Rate, % 24-Hr Cycle	48-Hr Cycle
1 mg	73 ± 21	81 ± 6
5 mg	89 ± 17	87 ± 5

In order to observe changes in the distribution of the chlorinated biphenyls in the PCBs mixtures after exposure to the activated sludge, selected samples of Aroclor 1221, MCS 1043, Aroclor 1016 and Aroclor 1242 were analyzed by EC/GC. The chromatogram for Aroclor 1221 is shown in Figure 2. The top trace is a chromatogram of the Aroclor 1221 standard, representative of the feed material. The center trace is that of a concentrated sludge extract taken at the end of a degradation cycle. At the bottom is a trace of an Aroclor 1242 standard run under equivalent conditions. The numbers above each peak indicate the dominant PCB represented by the peak as determined by GC/Mass spectrometry Comparison of the extract chromatograms to that of the Aroclor 1242 standard shows that the minor components in Aroclor 1221, which do not degrade as rapidly, are the major components in Aroclor 1242.

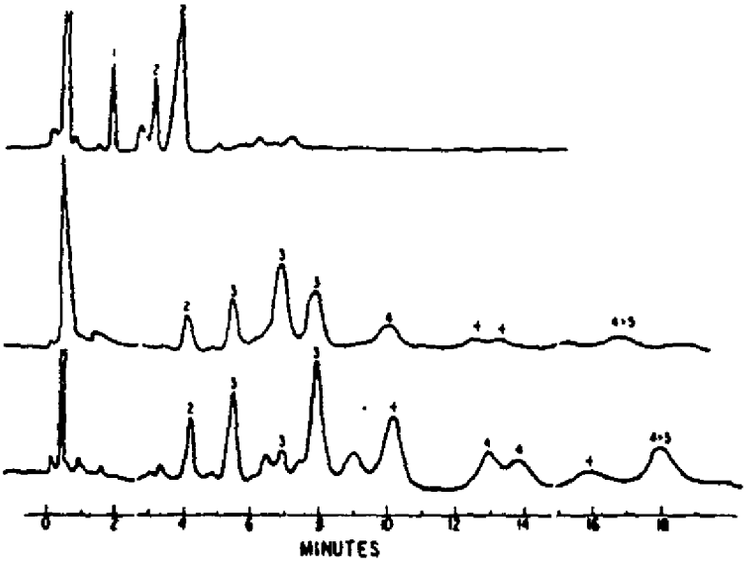

Figure 2. Typical electron capture chromatograms for Aroclor 1221, after exposure to activated sludge for 24 hours, and Aroclor 1242.

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It is important to note that the electron-capture detector does not have the same response for all components. With PCBs, the sensitivity of the detoctor generally increases as the degree of chlorination increases. From the Aroclor 1221 chromatograms, it is apparent that the dominant monochlorobiphenyl and dichlorobiphenyl components are readily degraded. Once the major components of Aroclor 1221 are degraded, the minor more slowly degrading components are easily observed after concentration of the sludge extracts.

Similar, less dramatic, alterations were noted for MCS 1043 and Aroclor 1242. No differences were observed in the extract and Aroclor 1254 standard chromatograms.

CONCLUSIONS

The results of this study demonstrate that commercial PCB mixtures which contain predominantly mono- and dichlorobiphenyls readily undergo primary biodegradation under the experimental conditions employed.

The data also illustrates that as the levels of tri-, tetra-, and pentachlorobiphenyls increase, the degradation rates decrease accordingly. This resistance of the more highly chlorinated biphenyls, particularly those containing 5 or more chlorine atoms per molecule, explains in part their detection as residues in weathered biological and environmental samples.

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