August 25, 1971

Dr. Eunice M. Moore
Director of Research and Development
Electrical Utilities Company
LaSalle, Illinois 61301

Dear Dr. Moore:

I have reviewed your present practice of disposal of your scrap pump oil and because of the extremely small amounts of persistent polychlorinated biphenyls involved I believe it represents an environmentally acceptable method of disposal.

Referring to your comments regarding Aroclor 1016, it is true that it is more biodegradable than the former askarel fluids. Do not, however, be misled into considering it biodegradable at the same rate that substances such as the "soft" detergents degrade. Those persistent PCB isomers which many laboratories have identified in the environment have been removed. The remaining isomers are the type that have not been identified in such samples as bird tissues. This absence strongly implies that in time the environment will degrade these isomers. The time required for this to occur is not specifically known and probably varies considerably depending on the multitude of other factors existing in the environment. We do know that it does not occur quickly, therefore we cannot recommend that Aroclor 1016 be freely disposed into the environment and that we should still treat it as a pollutant and dispose of it properly.

The modification of Aroclor 1242 to Aroclor 1016 represents a major responsible step toward improving the PCB environmental situation and its benefits will be evident in those situations in which control is virtually lost such as the failed capacitor buried in the city landfill.

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I hope my comments have been helpful. If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Environmental Protection

WBP/er