W. B. Papageorge - General Offices, BlND

January 10, 1974

W. R. Corey
K. W. Easley

CUSTOMER LETTER
EPA PCB EFFLUENT STANDARDS

Messrs.

P. G. Benignus
H. S Bergen
T. L. Gossage
C. Paton
J. F. Stapleton

Attached is a draft of a proposed letter to our PCB customers.

I would appreciate your comments for revisions as soon as possible because we plan to mail it by Tuesday, January 15.

W. B. Papageorge

/bt

Attachment

0004426

EX P-2162
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D R A F T

(Letter to PCB Customers)

Dear Mr.:

As your supplier of polychlorinated biphenyls, which your company purchases for dielectric fluid applications, we would like to take this opportunity to share with you the information we have of the Environmental Protection Agency's recent actions relating to PCBs in effluent streams.

1. On July 6, 1973, the EPA published in the Federal Register a proposed list of Toxic Pollutants. PCBs were included on the list.

2. On July 16, July 30, August 1, August 3 and November 29, 1973 public hearings were held by the Effluent Standards and Water Quality Information Advisory Committee to consider information pertinent to proposing effluent standards for toxic pollutants.

3. On September 7, 1973 the proposed Toxic Pollutants list was published without change.

4. On December 27, 1973 the EPA published proposed effluent standards for the Toxic Pollutants. Persons adversely affected by the proposed standards may file, by January 18, 1974, objections according to rules published January 4, 1974. Comments may be submitted


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in writing within 90 days. A public hearing will commence on January 25, 1974.

Copies of the Federal Register notices which pertain to these actions are attached for your use.

During this period Monsanto has commented both formally and informally to the EPA and to the Advisory Committee. Copies of our comments are attached. In addition, the General Electric Company has submitted comments. Copies of these are also enclosed.

The EPA acknowledges that time limitations established by court order required publication of the proposed standards at this time and that in some cases there may be inadequacies in the underlying data base. Comments and technical data are solicited. Industries involved with PCBs are expected to comment.

We sincerely believe the standard proposed for PCBs is unrealistically low and unwarranted and are deeply concerned of the adverse effect it will have on the continued use of PCBs. We plan to express our concern to the EPA in writing and by participating at the public hearing.

We strongly urge that your company, either independently or through your trade organizations, submit appropriate comments and participate at any of the public hearings which will be held during the next 90 days.



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If you share our concern and decide to submit comments you should file your objectives as outlines in the Federal Register, Vol. 39, No. 3, January 4, 1974; a copy of which is attached. Comments should be submitted to:

Dr. C. Hugh Thompson
Chairman, Hazardous and Toxic Substances
Regulation Task Force
Office of Water Program Operations
Environmental Protection Agency
Washington, D.C. 20460

The U.S. Department of Commerce has expressed a strong desire to be of service to industry in this matter and would like to receive copies of correspondence, comments, presentations, etc. This material may be sent to:

Mr. Fred Stein
Office of Environmental Affairs
U.S. Department of Commerce
Room 4424
Main Commerce Building
14th Street and Constitution Avenue, N.W.
Washington, D. C. 20230

We plan to keep you further advised of our activities in this matter and hope you can share with us any information your company may have to offer.

Sincerely,


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