

MORGENTHAU INDUSTRIAL CHEMICALS CO.

FROM: R. H. Munch - S. Second St. - St. Louis

DATE: March 9, 1972

cc: P. G. Benignus - GO
- W. R. Richard - GO

SUBJECT:

REFERENCE:

TO: W. B. Papageorge
General Offices - B2NK

cc: To P. Keller
Scott Tuckman

W.R. R. Benignus
Richard

You have asked for my comments on the latest draft of ANSI Committee C-107 proposed guidelines for handling askarels in the manufacture of capacitors. They are as follows:

1. The proposed guidelines represent a very great step forward because they show that the capacitor industry is beginning to understand the problem and is beginning to think about how to try to solve it.
2. The great problem is not what you or I or others connected with production and use of askarels think but whether or not we can secure agreement from environmentalists and government agencies that the guidelines are adequate to protect the public - present and future.
3. They will not be convinced unless we supply supporting data. The data needed are:
 - a) Proof that the lower PCB's do degrade more rapidly than the higher ones.
 - b) The best possible data on rates of degradation by all mechanisms - photo, bio, oxidative or others.
 - c) Data on toxicity. d) Data on migration of PCBs through soil.
 - e) Data showing how much the already accomplished industry actions will reduce PCB input, particularly higher PCB input, to the environment.
4. Were these guidelines approved by the whole committee - including members who represent the government and environmental viewpoint or only by industry representatives?
5. I am returning parts of the draft with minor errors which you will want to correct marked.
6. We need a similar document for the transformer industry.

I think that if we supply supporting data and get a guideline for the transformer industry too, we should be able to win.

R. H. Munch

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W. R. Richard

Position paper includes results
on STAS tests - formal paper
awaits ^{completion of} some minor experiments
and choice of journal and writing

Soil migration work in progress.
It looks very good - initial experiments
rough - will repeat under more
controlled conditions for publication.

R. Munch is aware of status of all
this work.

cc: R.E. Keller
R.H. Munch