PCB-Core WRB Governmental Agencies

APPENDIX A

November 19, 1969

To → J.T. Garrett

Mr. David Dominick, Commissioner
U. S. Department of the Interior
Federal Water Pollution Control
Administration
Washington, D.C. 20242

Dear Mr. Dominick:

In recent months, we have become increasingly concerned over the industrial use of polychlorinated biphenyls, commonly referred to as PCB's. These compounds are similar in chemical makeup to some of the persistent pesticides such as DDT and DDE. The compounds have been known commercially for some 25 years and are widely used as electrical transformer fluids. More recently they are finding wide application in coolants and hydraulic fluids in heavy industry.

We know that during the past year a number of major industries within Michigan have begun to use hydraulic fluids and coolants containing large percentages of PCB's. This is the case because these compounds have all the desirable qualities of the materials previously used and, in addition, are flame resistant and are less expensive. We estimate that about 300,000 gallons per year of PCB materials are presently being used by Michigan industries and that there is a potential market of about 1,000,000 gallons per year.

The present and projected market figures show that there is a consumption use of these products. A portion, and possibly a good percentage of the spent material, is finding its way in waste effluents into our lakes and streams. There seems to be conflicting opinions on the toxicity of chlorinated biphenyls. Their solubility in water is in the range of 50-100 ppb, but even at these levels there are indications that they are toxic to fish. Even of more concern, because they are heavier than water they tend to sink to the bottom of a stream or lake where they can completely destroy bottom life. Preliminary studies conducted by our staff indicate the PCB's may have caused the destruction of aquatic life in sectors of certain streams.

We have made a limited literature research and have not been able to find published data that evaluates the effect of discharges of chlorinated biphenyls on the aquatic environment. We are wondering if your scientists have such information. If not, we believe that immediate studies to determine the significance of PCB discharges to the surface waters is desirable and would benefit Michigan and the Nation.

We consider this to be a matter of extreme urgency and seek your early consideration and response to this request.

Very truly yours,

WATER RESOURCES COMMISSION

Ralph W. Purdy
Executive Secretary

WP/ch

MONS 090663