EIA 307a

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TO: EIA PCB Ad Hoc Committee DATE: 21 September 1976

FROM: Richard L. Rollins

SUBJECT: STATUS REPORT REGARDING PCB HEARINGS

Hearings on the recently proposed Toxic Pollutant Effluent standard for PCBs will begin at 9:30 a.m. Sept. 27, 1976 in conference room 2409 of the US EPA Waterside Mall located at 401M Street, Washington, D.C. Procedure will be that the seven EPA witnesses who have submitted affidavits are available for cross-examination. The objectors decide which, if any, of these witnesses desired to be cross-examined and submit the names to EPA on September 20, 1976.

The hearings will continue cross-examination of witnesses who are available until they are completed. Suspension of hearings will then occur until additional affidavits have been submitted and appropriate time for subsequent evaluation of these by objectors.

Finally, the objectors affidavits will become due and the EPA will review all testimony followed by request to cross-examine some or all of the submittors.

The EIA PCB Ad Hoc Committee objections to the standards is as generally outlined by our counsel, a copy of which has been previously distributed.

Our case is to critically examine the EPA testimony in the following six areas:

1. Criteria
2. PCB toxicity to fish and other aquatic organisms
3. PCB toxicity to birds and mammals
4. Treatment of discharges containing PCBs
5. Economic impact of industry meeting regulations and/or substituting for PCBs
6. Capability of analytical techniques to quantify PCBs in industrial effluents

The EIA is striving to have an expert(s) available for each area during cross-examination. As final commitments have been made with each expert, you will be appraised of them.

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A further up date will probably be at a meeting held sometime after the first week of hearings.

Richard L. Rollins

RLR:m

Attachment

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