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CITY OF NEW BEDFORD  
MASSACHUSETTS  
CITY PLANNING DEPARTMENT

June 9, 1982

Mr. Cliff Tuttle, President  
AEROVOX INDUSTRIES, INC.  
742 Belleville Avenue  
New Bedford, MA 02745

Dear Cliff:

Thanks for the material. Enclosed is some additional material. I note your remark in the letter issued to Goyette about the use of oils on City roads and private contractors doing the same through scrap dealers. I have since read your testimony to Congress (1976) stating the same.

In talking to you, you noted it was based on hearsay and referred me to Norm, who said the same. He mentioned a man named Burgess who picked up the bulk of the waste at Aerovox. Though Mr. Burgess passed away awhile ago, I did talk with 2 old-timers in independent disposal outfits, one of whose outfits bought Burgess out. He also used to service Cornell.

Both said that Burgess never peddled the material. It wasn't worth the bother. A market of consequence did not exist. Both said he brought the material to the dump, generally the nearest site at hand. Up to about 1971, the bulk of his disposal was at Sullivan's Ledge. I also talked with the DPW and Warren Brothers, and both were unanimous that PCBs were not used in roadwork. The City contracted the work in accordance with specs, and Warren Bros. only bought in bulk, not from small firms, and they always adhered to specs. The only oil Warren Bros. used was a cutting oil from Rhodes Eyelet. It helped keep the dust down. They never used it with asphalt. They were subject to inspection. No contractor in the paving business used it, according to an old-timer employed at Warren Bros., who did much City work many years ago. George Brightman of the DPW referred me to this employee.

In respect to some other remarks in your memo to Goyette, let me note the following. While concurring that Aroclor 1016 is biodegradable, this is relative. This is not meant to play down the significance of the different kinds, but it is meant to deny effects that are exclusive. While

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also concurring that 1016 is significantly less toxic than the higher chlorinated Aroclors, say 1254, this is still relative. Toxic effects have been observed. Again, the above logic applies. The Canadians observed the unexpected low presence of 1016's in their waters, based on estimated discharges of the different kinds of Aroclors. Scientists employed by the NMFS from Sandy Hook made the same observation in waters off New York (N.Y. Bight?).

As you noted in Congress, it is the isomeric structure which is significant. More testing, but of the Aroclor's components, would be helpful.

My view on this whole matter is that a cooperative effort between all groups, without fear of litigation, should be in effect since no one back then realized the consequences of standard procedures. Any criticism should be cultural and apply to all strata of society.

At any rate, the availability of your Aroclors for analysis, say with Woods Hole, would be helpful in making an assessment of the potential effect on public health. Woods Hole currently has their finger on what components are significant and what components may be present in local PCBs. Further, it is my belief this kind of analysis can date the effluents, and also provide basic and helpful information in determining the relationship between a commercial and environmental Aroclor. The alteration of the Aroclor into an environmental PCB may affect and mitigate the toxic potential, though the converse is possible. An analysis may reveal that there is no significant alteration, and hence the Aroclor can be readily identified with the source, say paints, etc., though my opinion is that this source is small.

In respect to the studies you forwarded, I tend to agree with the conclusions, though I have not had time to fully read them. Based on studies of 3 areas (Conn., Michigan, and Alabama), there appear to be no effects, though higher blood pressure levels were observed in one community. The New Bedford analysis revealed a weak blood pressure association for the younger age-cohorts. There was no association with the older cohorts. The City, however, does have a high hypertension mortality ratio, but an analysis of State Standardized Mortality Ratio (SMR) data seems to assign the cause to a dietic source linkable to ethnic and low-income groups, since this appears to be a common pattern in other communities in the State with high hypertension ratios.

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The 3 areas mentioned above are significant. They are the only areas undergoing chronic low-level interim exposure that have been studied. City levels are comparable to Connecticut and lower than in Michigan. The "no known exposure" group of the City is within estimated national norms. However, levels are generally higher for occupational exposure than fish eaters, and effects through occupational exposure have been observed (say Italy and Australia), though the levels there, as a rule, are much higher than in New Bedford. This difference is significant.

Nonetheless, elevated levels in studies of monkeys are comparable to very select groups in exposed communities, and effects on the monkeys have been observed, especially with fetii and infants.\* I find this sobering and this is an understatement. What it seems to say is that the method of exposure (constant vs discrete), kind of Aroclor (commercial vs environmental, as well as their constituents), and subject of exposure is significant. However, what it also says is the matter has to be researched with the utmost of precision. Since New Bedford is the only exposed coastal community, and since the whole nation exists with elevated levels (I have 10 ppb), it is imperative that all of us work together to resolve this matter in a rational manner. Consequently, I support a research program which will enable us to make accurate judgements about the potential of the chemicals. It would seem this is well within the budgetary scope and responsibility of the Federal and State agencies. This is why they are in business. The costs are very small compared to the very high remedial dredging costs that are anticipated. A research program can give some practicality to this measure, by directing us in respect to what action to take.

The real problem lies in doing all of this in a restrained manner (no headlines, etc.) yet that manner is sufficient to provide the commitment to do the job. It is a matter of harnessing speculation so that the horses don't run wild, which is not to say they don't run. There must be some way we can be rational and temperate without compromise in respect to the necessary commitment. Speculation should not be the breeding ground of advocates, but a fertile source to find answers to problems so that the public realizes their best interest is at the heart of us all. If they realize that intention, then confidence in lieu of fear may be the order of the day. Do you

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\*I note that gross observations have not identified any effects on marine life in Buzzards Bay.

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have any ideas, for I am at a loss at the process,  
which is not to say I am without opinion.

Sincerely,

*Robert B. Davis*

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ROBERT B. DAVIS  
Member, PCB Committee

RBD:rc

Enclosure : GW CZ M report, final ; C 6 and data

c.c. John A. Markey, Mayor