

64821
Appendix II-5



CORNELL-DUBILIER ELECTRIC CORPORATION

SUBSIDIARY OF FEDERAL PACIFIC ELECTRIC COMPANY
1005 E. RODNEY FRENCH BLVD. • NEW BEDFORD, MASSACHUSETTS 02744 • (617) 996-8502

September 12, 1975

Mr. Jeffrey Miller
Director, Enforcement Division
Environmental Protective Agency
J. F. Kennedy Federal Building
Boston, Massachusetts 02203

Dear Mr. Miller:

In response to Mr. Stanley W. Legro's letter and attached questionnaire dated 16 August 1975, attached are answers to the eleven questions contained in the questionnaire.

Since detailed records have not been maintained to accurately answer all questions, our replies in several areas are based on estimates and/or best judgment.

Sincerely yours,

CORNELL-DUBILIER ELECTRIC CORP.

Philip Murray
Philip Murray
General Manager

/g
Attachments

1. Cornell-Dubilier Electric Corp. is not a producer or importer of PCB compounds, therefore, this question is not applicable.
- 2(a) Description of each product. Cornell-Dubilier is engaged in the manufacture and sale of capacitors which are consumer products, in that these customers, with rare exception, do not buy capacitors for resale. Capacitors produced containing PCB compounds are defined as a passive electrical device, metal encased, hermetically sealed, containing kraft paper and/or plastic film and aluminum foil electrodes impregnated with PCB dielectric fluid.
- 2(b) Given below are the estimated pounds, by type of PCB compound, incorporated in our consumer products for the years 1971 through June of 1975.

Estimated Pounds of PCB Consumed in Manufactured Product

<u>Year</u>	<u>1242</u>	<u>1254</u>	<u>MS1016</u>
1971	550,400	8,300	424,100
1972	-	8,300	1,312,300
1973	-	8,300	1,309,000
	-	11,000	1,287,800
	-	4,500	470,800

Package
II

Pounds utilized by Cornell-Dubilier have been purchased from source of supply listed below:

Monsanto Company
Organic Chemical - Division
800 N. Lindbergh Blvd.
St. Louis, Missouri 63166

Given below is a summary of purchases by Cornell-Dubilier of the three different types of PCB compounds, by Monsanto part number, beginning with 1971.

<u>Year</u>	<u>Monsanto Part No.</u>	<u>Pounds Purchased</u>		
		<u>1242</u>	<u>1254</u>	<u>MS1016</u>
1971		658,000	0	507,000
1972		0	0	1,518,500
1973		0	0	1,514,700
* 1974		0	12,000	1,539,600
1975 (6 mos.)		0	6,000	526,400

* Note: 30,000 lbs. of MS1016 was sold to Aerovox Industries, without replacement, to cover a material shortage condition in 1974.

- 2(d) Given below are the names and addresses of company facilities which handle products containing PCB compound:

<u>Year</u>	<u>Incineration</u>	<u>Landfill</u>
1971	180,000 estimated	48,800
1972		65,600
1973	347,490	65,400
1974	141,570	64,500
1975(6 mos)		23,500

5(c) Incineration:

1971 Monsanto Company
 Organic Chemical Division
 800 N. Lindbergh Blvd.
 St. Louis, Mo. 63166

1973 & 1974 Chem-Trol Pollution Services, Inc.
 Model City, New York 14107

Landfill: *

Solid Waste Department
 Sanitary Landfill Area
 City of New Bedford
 Shawmut Avenue
 New Bedford, Mass. 02741

*Note: It is estimated over 99% of the PCB's disposed of by landfill method were hermetically sealed capacitors described in 2(a) above with the balance being absorbant materials.

6. Given below are the three types of PCB compounds, by Monsanto part number, used by Cornell-Dubilier Electric Corp.

MS1016
 1242
 1254

7(a) Concentrations of PCB compounds in the effluent:

PCB analyses have been made for Cornell-Dubilier on the following discharges:

1. Drain #001 to City of New Bedford Storm Sewer and then to Ft. Phoenix Reach.
2. Discharges to City of New Bedford sanitary sewers.
3. Roof runoff.
4. Ft. Phoenix Reach 25' south of City of New Bedford storm sewer discharge.

7(c) Concentrations of PCB compounds in receiving waters (upstream) have not been conducted, however, results of (downstream) are shown in 7(a)-4 above.

8(a) Methods by which PCB compounds are transported to and/or from Cornell-Dubilier Electric Corp. are as follows:

To CDE:

- 1) Penn Central Railroad
via tank car from
Monsanto Company, St. Louis, Mo.
- 2) Transferred to a CDE tank truck at railyarding in
New Bedford and driven to the plant.
- 3) Less than 1/2 of 1% of CDE's total purchases were
received in drums from Monsanto Company via
common truck carrier.

From CDE:

- 1) To New Bedford Landfill via truck by
ABC Rubbish Disposal
246 Clifford Street
New Bedford, Mass.
- 2) To Incineration via Chem-Trol Pollution Services, Inc.
company-owned truck .
- 3) Return to Monsanto for incineration via railroad tank car.
- 4) All shipments of consumer products are made via truck
carriers listed in 8(b) below.

8(b) Given below are the names and addresses of all known transporters of PCB compounds.

Associated Transport Inc.
380 Madison Avenue
New York, New York 10017

W. L. Mead
P. O Box 31, Cleveland Road
Norwalk, Ohio. 44857

Branch Motor Express
114 Fifth Avenue
New York, New York 10011

Old Colony Transportation Co. Inc.
676 Dartmouth Street
So. Dartmouth, Mass. 02748

Burgmeyer Bros.
50 S. 5th Street
Reading, Pa. 19601

P I E
1417 Clay St. , P. O. Box 958
Oakland, California 94604

Monsanto 1254 by converting to MS1016 as a continuation of our effort to utilize PCB compounds containing fewer chlorine atoms per molecule. CDE is continuing its program of personnel education, equipment modification, upgrading, handling and processing changes all aimed at reducing PCB discharge from its plant.