UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

September 28, 1982

Gentlemen:

As a manufacturer of chlorinated compounds, you should be aware of a recent report by the Chemical Manufacturers Association, "A Report of a Survey on the Incidental Manufacturer, Processing, Distribution, and Use of Polychlorinated Biphenyl at Concentrations Below 50 ppm" dated November 15, 1981.

This report lists at least one compound which you manufacture as suspected of generating inadvertent PCB's. As a result, you may be involved in the processing or disposal of PCB's in a concentration of 50 ppm or greater. If so, you must comply with the enclosed Toxic Substances Control Act (TSCA), May 31, 1979, Regulation governing PCB's. PCB's are defined as any chemical substance or mixture which contains a biphenyl molecule which is chlorinated to varying degrees. It should be noted that mono-chlorobiphenyl is considered a PCB.

The manufacturing or processing of PCB's at a concentration of 50 ppm or greater is strictly prohibited. Therefore, you cannot manufacture or process any chemical which contains 50 ppm or greater PCB's at any time during the manufacturing or processing stage unless you obtain an exemption. Further, the production of a by-product containing PCB's at a concentration of 50 ppm or greater is a violation of the PCB manufacturing ban. If you need to obtain an exemption, you should notify us and petition the Office of Toxic Substances, Document Control Officer, 401 M Street, SW., Washington, D.C. 20460.

The disposal of PCB's is strictly controlled by the PCB regulation. There are four disposal categories present in this regulation:

1. Liquid PCB's at a concentration of 500 ppm or greater must be burned in an approved PCB incinerator.

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2. Liquid PCB's at a concentration of 50 ppm to 500 ppm may be burned in an approved PCB incinerator. They may also be shipped to an approved PCB Chemical Landfill. In addition, these liquid wastes may be burned in a high efficiency boiler. Prior approval from EPA is required on a case by case basis. Refer to Section 761.10(a)(3)(iii) of the enclosed PCB Regulation from the Federal Register for guidelines.

3. PCB's at a concentration less than 50 ppm have no disposal requirements; however, they cannot be used as a sealant, coating, or dust control agent if the PCB's are at a detectable level.

4. Solid PCB's at a concentration of 50 ppm or greater may be disposed of as in (1) above. They may also be shipped to an approved PCB Chemical Landfill.

To insure that you are in compliance with this regulation, we encourage you to sample and analyze your products and waste streams for PCB's. We would appreciate a copy of these results. If you find that you have PCB's at concentration of 50 ppm or greater, please contact us immediately at 214/767-2734. Please inform us of your findings within 60 days.

We have enclosed a copy of the PCB Regulation, a proposed rule on PCB's: Manufacture, Processing, Distribution, and Use in closed and Controlled Waste Manufacturing Processes, and a copy of a draft analytical procedure for detecting PCB's in waste streams which gives valuable information on the PCB Regulations. For further information, please contact Larry Thomas at 214/767-2739 or Darl Mount at 214/767-9737.

Sincerely yours,

Norman E. Dyer, Ph.D., Chief
Pesticides & Toxic Substances Branch

Enclosures

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2. Liquid PCB's at a concentration of 50 ppm to 500 ppm may be burned in an approved PCB incinerator. They may also be shipped to an approved PCB Chemical Landfill. In addition, these liquid wastes may be burned in a high efficiency boiler. Prior approval from EPA is required on a case by case basis. Refer to Section 761.10(a)(3)(iii) of the enclosed PCB Regulation from the Federal Register for guidelines.

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To insure that you are in compliance with this regulation, we encourage you to sample and analyze your products and waste streams for PCB's. We would appreciate a copy of these results. If you find that you have PCB's at concentration of 50 ppm or greater, please contact us immediately at 214/767-2734. Please inform us of your findings within 60 days.

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Sincerely yours,

Norman E. Dyer, Ph.D., Chief
Pesticides & Toxic Substances Branch

Enclosures

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A REPORT OF A SURVEY ON THE INCIDENTAL MANUFACTURE, PROCESSING, DISTRIBUTION, AND USE OF POLYCHLORINATED BIPHENYL AT CONCENTRATIONS BELOW 50 PPM

Prepared For:

Chemical Manufacturers Association

2501 M Street, N.W.

Washington, D.C.

By

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November 15, 1981

REGULATORY RESEARCH SERVICE

A DIVISION OF THE KIRSCHNER ORGANIZATION

0755827

federal register

Tuesday
June 8, 1982

Part VII

Environmental Protection Agency

Polychlorinated Biphenyls (PCBs); Manufacture, Processing, Distribution, and Use in Closed and Controlled Waste Manufacturing Processes; Proposed Rule

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Table 5 Classes of Chemicals Whose Manufacture is Suspected of Generating Inadverteht PCBs

(A)

- chlorinated paraffins
- chlorinated acetophenones
- chloronitrobenzenes and chloroanilines.
- chlorobenzene sulfonic acid and chlorophenyl sulfones
- chlorobenzyl derivatives
- chlorophenyl sulfides
- chlorofluorobenzenes
- chlorotoluidines
- chlorobenzides
- chlorobenzoyl compounds
- chlorotoluenes
- chlorobenzenes
- chlorophenols
- chlorophenyl silanes
- chlorophenyl phosphenes
- perchloroethylene
- carbon tetrachloride and precursors
- chloroethanes and chloroethylenes
- chloropropanes
- chlorocyclohexanes
- phenols or phenyl ethers (made from halobenzenes produced on-site)
- chlorobenzaldehydes
- chloro benzoic acids
- chlorobenzophenones
- all chlorinated insecticides
- alkylbenzenes (excluding those produced directly from crude oils)

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