Monsanto

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(—LOCATION—PHONE) J. H. Craddock - B3NA (4-4764)

DATE : June 21, 1983

cc.

SUBJECT : New PCB Regulations - Impact On Monochloro & Lower Chlorinated Biphenyl Producers

REFERENCE :

TO : K. S. Rosenberg - B3SG

The following is in response to your questions of June 15.

1. Attached is a copy of the proposed EDF/CMA "consensus rule for incidental PCBs."

2. In this proposed rule monochloro biphenyl (MCB) will be discounted by a factor of 50 in determining PCB limits, therefore the concentration of MCB - PCBs leaving any manufacturing site or imported - averages less than 25 micrograms per gram (25 ppm) - could in reality be as high as 25 x 50 = 1250 ppm if all present as MCB.

3. I would keep the PCB (and MCB) as low as possible. If the level creeps up other problems, e.g., media, public perception, could be a factor.

4. The proposed incidental rule could affect systems with MCB contaminated fluid to the extent that it provides an exemption (or use authorization for the product) similar to the manufacturers of incidental PCBs if they abide by other provisions of the rule concerning disposal, record keeping, maintenance, etc. Theoretically their equipment could have MCB (up to 1250 ppm) contamination.

5. This rule will not affect Therminol FR contamination except for any mono- and di-chlorobiphenyl isomers present. For practical purposes old Therminol FR contamination will be regulated the same as before (50 ppm maximum).

   Note: Another rule not yet proposed is in the works to provide a use authorization for old heat transfer and hydraulic systems containing other than "incidental PCBs" at any level. (The current 50 ppm use authorization will expire July 1984.)

6. The answer to this question depends on a lot of other factors such as what is already present and at what levels.

J. H. Craddock

/dg

Attachment

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