Monsanto

FROM (NAME—LOCATION—PHONE) J. H. Craddock - General Offices A2SA (4-4764)

DATE : June 17, 1982

cc: J. R. Condray - G3WG
P. S. Park - G3WB

SUBJECT : Petition for Exemption from PCB Processing Prohibition

REFERENCE :

TO : F. E. Kearney - E2SA

Attached (Attachment I) is the information relating to Monsanto's only request for a PCB processing exemption filed by Wink Corey in 1979. The request covered phthalocyanine pigments for plastics use in several MP&R products.

Also attached (Attachment II) is the recent letter from Don Clay of EPA stating that we must refile the petition and list the items needed in the petition. The most difficult item is demonstration of "good faith efforts to develop a substitute substance". (Copies of the regulations and lists of other petitioners are attached for your information - Attachment III.)

DCMA filed a class action petition also in 1979 for the broad category of pigment use. They are currently actively involved in the EDF lawsuit/new regulations issue as one of the litigants and will probably refile their class action petition.

The deadline for filing is July 19, 1982. Please let me know your status of useage of these dyes and the desires and intent of MP&R with respect to possible refiling this exemption petition. I suggest we contact DCMA to determine their strategy.

J. H. Craddock

/dkr
Attachments

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