EIA

SPILL NOTIFICATION AND CONTROL PLAN

FOR

POLYCHLORINATED BIPHENYLS (PCB's)

A. Introduction:

Studies have shown that products containing polychlorinated biphenyls may be persistent, an environmental contaminant and, possibly, injurious to certain forms of bird, aquatic and animal life. It is, therefore, extremely important that entry into the environment be minimized in the event of spillage of these materials while they are in transit by rail tank car or tank truck.

B. Purpose:

To establish a simple, effective procedure to be followed by the manufacturer (Monsanto) and capacitor manufacturers using polychlorinated biphenyls of notification and action, to be taken in case of an accidental spill while the material is in transit from Monsanto to the capacitor manufacturer.

C. Spill Notification Procedure:

1. Each tank car transporting PCB's from Monsanto should be marked on its sides and ends boldly in 4" to 6" high letters with instructions, In Case of Spill Call 618/271-5835, collect.

2. Each capacitor manufacturer should provide Monsanto with a telephone number that is manned 24 hours per day 7 days per week. If this is not possible, then each capacitor manufacturer should provide the names and telephone number of at least three individuals that Monsanto could call in succession, if necessary, in order to make contact to report a spill.

3. In the event of a spill call being received by Monsanto, the person

taking the telephone call informing of a spill should be trained to obtain the following information:

a.) The name of the caller.

b.) The official title and function of the caller.

c.) All the information available concerning the accident such as:

1 Exact location (in sufficient detail to find the site on maps and on the ground).

2 Time of occurrence (as close as possible).

3 Name of transportation company and their emergency calling number.

4 Amount of material spilled.

5 Condition of the transportation equipment.

6 Who else has been informed (list name and title).

7 Disposition of casualties, if any (what hospital, clinic or physician).

8 Witnesses (name and address).

d.) How to contact the caller or other responsible party at or near the scene.

e.) Whether local, state and federal pollution agencies have been informed. If yes, who was contacted and at what number.

4. In addition to the above, the following information should be provided to the person reporting the spill by Monsanto, acting as agent for the capacitor manufacturer:

a.) Material is fire resistant.

b.) It is recommended that rubber boots and gloves of Neoprene or PVC be worn when handling these materials to avoid possible skin irritation.

5. Monsanto should immediately notify the appropriate capacitor manufacturer

that a spill of his mater al has taken place and should provide the information obtained per paragraph 3 sections a through c.

6. The capacitor manufacturer, on notification of a spill, should immediately notify state and federal pollution agencies and then dispatch a responsible individual to the spill site.

a.) To notify the federal pollution agency call

b.) To notify state pollution agency, if number is not known call regional EPA office to obtain state number. (See attached map and phone list.)

D. Monsanto's representative will provide the following recommended control procedures to the person reporting the spill:

a.) Do not allow material to flow into sanitary or storm sewers, pond, lakes or rivers.

b.) Do not wash material away or into sanitary or storm sewers, ponds, lakes or rivers

c.) Limit the amount that escapes from the container by righting the container (tank car or drum), closing valves, plugging a hole with a wooden peg or other actions as required.

d.) Limit spread of material by using absorbent materials such as dry sand, sawdust, oil absorbers or rags or by erecting an earthen dam using any equipment available in area.

e.) Pump any free oil standing within the contained area into drums or tank truck.

f.) If other freight is contaminated, be sure it is quarantined until disposition can be determined. It must be decontaminated or disposed

of in a responsible manner.

E. The following clean up procedures should be considered:

a.) If there are shallow wells in the surrounding area, sample the water from the wells and analyze for PCB's. Be sure the water from a contaminated well is not taken internally.

b.) Dig up contaminated earth and have it hauled to an area approved for the disposal of PCB's.

c.) Decontaminate any equipment used in the clean up operation or dispose of it in a manner which prevents it entering the environment.

1.) Transportation equipment must be thoroughly cleaned before it can be used for other purposes. The cleaning of the equipment must not be allowed to contaminate sewers, streams, or other areas not approved for disposal of PCB's.

F. Tank Truck Transportation:

1. Companies using their own equipment and personnel to transport their PCB from the manufacturer or freight yard should have their personnel instructed on how to handle a spill and this should be documented in their own spill control plans.