Monsanto

FROM (NAME—LOCATION—PHONE) John H. Craddock - St. Louis A2SA 4-4764

DATE : August 4, 1982

SUBJECT : JULY MONTHLY REPORT

REFERENCE :

TO : R. S. Nelson - A2SA

cc: C. F. Callis - B3CA
S. G. Collins - A3NC
J. G. Nassif - E2ND
L. J. O'Neill - A3NC
P. S. Park - G3WB

PCB SURVEILLANCE PROGRAM

EDF vs. EPA Lawsuit/New PCB Rules

Incidental Generation - Rule II -- The formal comment period closed July 8 for the "incidental generation" rule, and EPA hearings were held July 26. Monsanto submitted individual comments on this proposed rule,as well as supporting and participating in CMA submissions. Dr. Bob Kaley of Monsanto testified at the hearing as an analytical chemistry expert witness for CMA.

All parties at the hearing, including EDF and industry witnesses, testified that the proposed rule was inadequate and not based upon good analytical science. CMA asked EPA to withdraw the proposed incidental generation rule.

General -- EPA has continued to assert that they are on schedule and will send the proposed first rule,"closed electrical" uses, to OMB the first week of August. This rule is scheduled to issue August 13. In addition, the proposed "incidental generation" rule is still scheduled to issue October 13.

An informal meeting among EDF/NRDC and a few industry representatives, including Monsanto, was held July 29 to discuss ways to negotiate a "reasonable compromise" for the pending PCB rules. All parties, including EDF, expressed the feeling that the meeting was informative and constructive and that there were bases for agreement on many PCB issues. A second meeting is scheduled for August 5 in Washington, DC, and John Craddock will participate.

EPA still appears to be in a quandary over the proposed rules and has acknowledged privately that they hope industry and environmental groups come to a reasonable agreement. They would probably support a joint rulemaking proposal and ask the DC Circuit Court for a time extension to complete the rulemaking(s).

EDF has suggested that a risk assessment of PCB health and toxicity effects is needed. A big question is who would do a scientifically objective review since EDF doesn't trust industry scientists and consultants, and possibly EPA. EDF may propose another science symposium jointly sponsored by environmentalists, industry and government to review PCB health effects. EDF believes the EPA May symposium was biased.

PCB Disposal

Pyro-Tech Systems, Inc., received EPA approval for operation of a new commercial PCB incineration process at Tullahoma, Tennessee.

Monsanto plants continue to dispose of accumulated PCB wastes in an orderly fashion. WGK plant has essentially completed disposal of its backlog of stored organic process wastes containing PCB's.

PCB Inquiries/Responses

Over 140 PCB inquiries/responses were handled this month.

J. H. Craddock

jh

PCB-ARCH-EXT0381692