Monsanto

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March 17, 1983

Mr. David Dull
Chemical Regulations Branch (TS-794)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D. C. 20460

Dear David:

Enclosed for your information is a summary draft of items in the PCB consensus rulemaking from June - August, 1982 time frame. Included in the discussions were:

EDF	- Ellen Sibergeld
NRDC	- Jackie Warren
CMA	- Ken Burgess (Dow)
	John Craddock (Monsanto)
	Ed Warren (Kirkland & Ellis)
	Bob Fensterheim (CMA Staff)
NEMA	- Steven Rosenthal (Attorney)
EEI	- Toni Allen (Attorney)
	Jim Davis (Attorney
	Carl Manger (Baltimore - Gas & Electric)
Other Industries	- Jim Bryant (Std. Chlorine)
	John DeKaney (EOI)
	Marshall Miller (Attorney Rep - Dow Corning)
	Various Dow Corning staff from time to time

All parties had essentially agreed in principle to the concepts in this summary, although ways to put them in rule form were not worked out.

This was an attempt to cover all remaining PCB issues in the Court decision including the following:

- Totally enclosed electrical equipment
- Incidental generation
- Spill clean-up
- Methods of analysis
- Disposal of used fluids
- Lower chlorinated congener differences

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The reasoning was to develop a package having consistent values used for regulatory purposes in all these areas.

I hope this is helpful. Good luck in the next round of discussions with the new cast of characters!

Yours truly,

John H. Craddock
Product and Environmental
Safety Director

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