Monsanto

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

DATE : September 9, 1982

SUBJECT : NEW PCB ELECTRICAL EQUIPMENT RULES

REFERENCE :

TO : See Distribution

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The EPA published the final PCB electrical rule covering "totally enclosed" electrical equipment August 19, 1982, in the FEDERAL REGISTER. This rule becomes effective September 24, 1982.

The impacts of this rule on Monsanto will be based upon the following requirements:

1. Phase-out of PCB transformers in areas that may pose a risk to food or feed products, by October 1, 1985.

2. Phase-out of PCB capacitors in areas that may pose a risk to food or feed products, by October 1, 1988.

3. Scheduled inspections comparable to the current Interim Measures Program.

4. Recordkeeping for inspections and maintenance.

In addition, the current rule defines disposal to include any leaks.

The required phase-out of PCB equipment in areas that pose a risk to food and feed, simply put, incorporates provisions of proposed FDA and USDA rules into TSCA. Most Monsanto plants have been following our previous informal recommendations to replace such equipment in an orderly, planned program as soon as possible.

A summary of the significant new amendments to the PCB rules is provided (attached), along with a copy of the full FEDERAL REGISTER notice.

If you have specific questions, please let me know.

J. H. Craddock

jh
enclosures

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