Monsanto

FROM (NAME—LOCATION—PHONE) J. H. Craddock - B3NA (4-4764)

DATE : August 6, 1984

SUBJECT : Inadvertent PCB Rule - Exemptions/Exclusions For Manufacture

REFERENCE :

TO :
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The new "inadvertent" PCB generation rule published in the Federal Register July 10 becomes effective October 1, 1984.

The new rule limits unintentionally generated PCBs in products to an annual average concentration of 25 ppm and a maximum excursion of 50 ppm. In addition, the rule stipulates that if any product leaving the site (or imports) contains inadvertent PCBs at a concentration of 2 ppm for any resolvable GC peak (on a discounted basis for mono- and di-chloro biphenyls), certain reporting and certification requirements by a company officer must be met.

From results of your product surveys and analyses and several in-house technical reviews of the process chemistry, I do not know of any Monsanto product which will require reporting and certification. I have heard similar results from other company members on the CMA Task Force that negotiated this rule. However, EPA will most certainly challenge this on selected inspection trips if no reports are received.

I suggest that you set up a file containing the analytical results for products reviewed in conjunction with this rule - especially those on EPA's two hit lists.

In addition, would you please furnish me with a list of products that have been surveyed and analyzed by your operating unit in conjunction with this rule. CMA intends to informally notify the agency how many actual products have been surveyed and how many exclusion reports the agency can expect. (If you recall, the industry-CMA position was that this is a de minimis problem.)

In addition, in this rule use authorizations have been re-established for existing heat transfer and hydraulic systems containing less than 50 ppm PCB. However, the rule requires use of certain rubber gloves and protective actions for workers using and servicing this equipment. Please be sure to inform plant staff of this requirement and encourage them to include appropriate record statements that the equipment was used and disposed of or decontaminated properly.

J. H. Craddock

/dg

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