Monsanto

FROM (NAME—LOCATION—PHONE): Evan J. Young - Akron 160

DATE: September 27, 1979

SUBJECT: PCB DISPOSAL

REFERENCE: Yours 9/17

cc: S. O. Dingler
J. A. Finch
M. E. Gatens
R. S. Nelson
D. Wood
R. W. Wise

TO:

Mr. R. L. Liss
B2SC - G.O.

Ray, I have tried to call you to discuss your reference memo regarding containers and disposal of waste Therminol.

Your response is right out of the book, but it is unacceptable because we can't live with that. Let's work together for an acceptable alternate.

First, let's review:

1) We analyzed and found 2% PCB in our Therminol.

2) 2% is above the acceptable limit, so the system must be drained and refilled within six months of the analysis (no later than Feb. 1980).

3) We have ordered 35 drums of fresh Therminol 55 to be delivered in October in 55 gal. tight head drums.

4) We intend to change out the system in October between the cooling and the heating system, because our next opportunity would be April 1980, two months after the legal deadline.

5) Our preference is an incinerator. You say there are none approved, but there are still some that are <u>not disapproved</u>!

6) The alternate of storage of 35 drums of PCB contaminated Therminol in a diked area under roof is beyond our facilities. We aren't going to erect a building just for this.

Now let's consider alternate actions. For starters, here are some alternates we propose to get this job done:

1) Far and away the first alerternate is to get one of the remaining incinerators approved. You say by the end of 1979. Can we push for end of October? November?

2) As a second alternate, if we have to store it, find an acceptable site, either within Monsanto, or outside. We've done some calling around ourselves but no other Monsanto site seems to want to add our problems to what they already have. Could you use the leverage of your department to help us?

3) Lastly, Monsanto could go in for an extension of time. This may not be impossible, but when I read about a special exemption in Kansas to approve a disposal site for 100 carcasses of slain cattle because they were contaminated with PCB, it makes me wonder. What was involved? A teaspoonful? We have several gallons. Is this a viable alternate?

Ray, the end of October is about the latest we can do this with our fierce Ohio winters. Any later and we'd have to send the employees home, take a chance on freezing up all the pipes, and hope Therminol would be non-viscous enough to flow.

Help!

Evan

Evan J. Young

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