Monsanto

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

DATE : June 25, 1982

SUBJECT : ANALYSIS OF PROCESS STREAMS/ PRODUCTS FOR "INCIDENTAL PCB'S" - PRB BUDGETING

REFERENCE :

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The recently proposed new PCB regulations regarding incidental generation in process streams, and ultimately products, will add a significant burden and added cost impact to various operating units.

When the actual total analytical method/protocol using the required electron impact mass spectroscopy and capillary column GC is finally published by EPA -- and we believe that this is the route of compliance measurement/enforcement they intend to use -- we should take steps to determine the actual status of our Monsanto processes/products that will be impacted.

In our initial survey data submitted through CMA (under confidentiality) we estimate that 340 Monsanto processes may be affected because they fit the "chemical reactant"/conditions criteria EPA planned to follow in monitoring processes for incidental PCB's.

These processes should be evaluated by the method EPA intends to use for compliance of the proposed new regs in the near future (perhaps as late as first quarter 1983 -- maybe sooner!) to determine the potential impact upon Monsanto processes/products and future PCB waste disposal costs.

I urge you to include a priority increment in your PRB tower to cover this requirement.

As soon as more definitive information is available, I will inform you. As of now, comments on the "closed process" regs are due July 8 even though the analytical methodology is still a "black box" technique. (Monsanto analysts have guesstimated that the "non-quantifiable" level could be in the 100 ppb per PCB isomer range based upon what we know and suspect of EPA's proposed analytical requirement.)

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CMA has requested an extension of the comment period until 30 days after publication of the total analytical protocol on legal grounds. EPA has not yet responded to this request.

J. H. Craddock

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