

AUG 27 1980

FROM: J. H. Craddock - St. Louis G3WA 4-4764

DATE: August 26, 1980

SUBJECT: PCB CONTAINER SPECIFICATION

REFERENCE:

TO: O. N. Mueth - AA3D

CC: C. F. Callis - B3CA
J. R. Condray - C2SA
P. H. Hobson - G5WG
G. L. Jessee - C2SA
R. W. Kienker - E2SA
R. S. Nelson - G3WA
W. B. Papageorge - G4WA
W. R. Robirds - F2WA
P. H. Smith - E2NE
Environmental Control Committee

I concur with your recommendation to amend the Monsanto Corporate Distribution Department Standard VIII-A-1 of the Sample Packaging Guidelines for PCB drums.

This change will comply in all aspects with the Final PCB Disposal/Storage Regulations (40 CFR 742.(c)(6) and will be responsive to requests of our plants by making the internal Monsanto standard essentially equivalent to that of the federal regulations.

I will entertain comments on your proposed amendment from the Environmental Policy Staff, DEO's and other members of the environmental network. If no serious objections are raised, I will ask that you proceed to amend the Monsanto standard September 15 and publish a new specification.


J. H. Craddock

jb
enclosure

Note to carbonees: The proposed amendment of the PCB container specification appears to be a step in the right direction for helping our plants comply with regulations more easily and economically. We have had two instances where the Monsanto PCB container specification being more stringent than federal regulations caused significant problems, time delay and frustration of line personnel who were trying to safely dispose of these materials and comply with the regulations. I recommend that you support CDD's proposed amendment and will await responses from carbonees before proceeding. Please give me your comments by September 12.

JHC

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