Monsanto

FROM (NAME—LOCATION—PHONE) J. H. Craddock - G4NH (4-4764)

DATE : February 14, 1983

CC: W. B. Papageorge - G4NH
P. H. Smith - G3WB

SUBJECT :

REFERENCE :

TO : D. E. Cayard - C2NC
M. F. Weishaar - G5WA

Re EPA Region VI letters of September, 1982, regarding incidental PCB regulation.

Background

About September, 1982, Region VI EPA sent letters to Luling and Texas City plants regarding possible incidental PCB generation in products at these locations. The letter and informal request to assure we were in compliance with TSCA PCB regulations also included a page listing various suspected processes from an EPA contractor report (Versar) that was distributed to CMA. A follow-up call from EPA to the plants was received about December.

Status

After several weeks of attempting to contact the EPA staff identified in the letter, Larry Thomas (214/767-2739), who was replaced by John West, I finally made contact with Mr. West February 10, 1983, about 4:00 p.m.

After amenities and a brief discussion with Mr. West, I learned that he no longer has PCB responsibility (asbestos now). Mr. Darl Mount is the PCB contact person.

West and I discussed the fact that reporting of PCB levels in products, etc., is by exception if it exceeds 50 ppm or other stated criteria and that there is no requirement to report this information. I informed him that we did monitor to assure compliance and that if we believed we had no reason to suspect a problem we did not routinely monitor all possible situations. West agreed that he saw no requirement to respond to the request and no pressing need for the information.

Accordingly, I told West to consider this phone call the Monsanto response unless the agency felt a real need for the data (Mount is in a near-by office and West said he would mention my call to Mount). If the agency wishes to pursue the request further, I asked them to phone me.

Please let me know if you or the plants have any more follow-up from the agency.

J. H. Craddock

/dg

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