KIRKLAND & ELLIS

M E M O R A N D U M

PRIVILEGED AND CONFIDENTIAL

VIA FACSIMILE

TO: CMA PCB Panel
Elizabeth Watson

FROM: Tim Hardy

DATE: May 11, 1993

RE: EPA PCB Disposal Rule

Toni Allen reported yesterday that Tony Baney called to say the disposal rule was on track. That means there will be one more work group meeting, then red border review, then a proposal.

As to what we could do for Tony (for us), Mr. Baney had one item:

He says he's heard some people want to solidify PCB-containing soil so that it can go to a municipal landfill. He's willing to put guidelines for such a disposal method into the proposed rule, but needs a treatment standard to accomplish that task (evidently all he has now is the concept that the solidified material must pass a leaching test with no more than 50 ppb PCBs in the leachate). If anyone has any helpful information, we should get it to Tony within a week. Please call.