Monsanto

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JN HAGGART - Brussels

September 28, 1972

MEETING WITH UK DEPT OF ENVIRONMENT SEPT 26TH, 1972
JNH/cdl

TO :

cc

S TUROVER	-	Brussels
S CHANTRELL	-	London
JF CHURCHILL	-	London
HA VODDEN	-	Ruabon
RA BAXTER	-	Ruabon
PJA MARSH	-	Brussels
AA / SR	-	Brussels
C PATON	-	St. Louis
WB PAPAGEORGE	-	St. Louis ✓
K FLETCHER	-	Brussels

Jell
PCBs

Attached are my notes on the meeting called by the Dept. of the Environment to discuss the OECD PCB Meeting in Paris on Oct 3rd.

To summarise the situation, the UK delegation will seek to avoid legislation as a means of controlling the sale of PCB's but will consider including PCB's in legislation relating to disposal of waste products.

If we wish to have incineration approved as a safe means of disposing of PCB's, we need to provide evidence that this is a satisfactory method.

[redacted]

If we wish to have the disposal of small capacitors treated independently of the methods for disposal of transformers, we need to give evidence of biodegradeability, annual tonnage involved and likely effect on the environment.

The Dept. of the Environment would like to formalise our position on restricted sales to dielectric applications by printing a document summarising our form of voluntary control in much the same way as the Voluntary Control of Pesticide scheme already in existence. This is to satisfy onlookers such some OECD members who are generally suspicious of voluntary schemes.

The proposals on PCB dielectric coming from the ANSI C-107 meeting in the USA on October 3rd are of interest to the Dept. of the Environment.

Trade statistics on the import and export of electrical equipment containing PCB's are not available. The Dept. of Trade and Industry will contact BEAMA (UK Electrical Equipment Association) to ask them for any data they can give.

[redacted]

(cont'd)

Meeting with UK Dept. of Environment - Sept. 26th, 1972

ACTION REQUIRED :

HA VODDEN : Please draft out a submission on incineration as a safe disposal method for PCB's and preliminary notes on how you would present a case for different waste disposal rules for small capacitors containing lower chlorinated biphenyl.

JF CHURCHILL : Please firm up data on how much dielectric PCB leaves and enters the UK inside electrical equipment if possible broken down as follows :

	HOME USE		EXPORT		IMPORT	
EQUIPMENT	N° of Units	PCB Tonnes	N° of Units	PCB Tonnes	N° of Units	PCB Tonnes
Fluorescent lighting caps 220 V						
Motor Start & others 440 V						
Power Factor Correction						
Distribution Transformers						

Perhaps David Tucker can dig some of this out during his calls.

JN HAGGART : Get data on ANSI C-107 Oct. 3rd Meeting. Wait for Dept. of Environment to propose formalisation of our restricted sales policy along lines of Pesticides scheme.

(cont'd)

DEPARTMENT OF ENVIRONMENT
2, MARSHAM STREET
LONDON S.W. 1

September 26th, 1972

Ian PRESST	- Dept. of Environment
Ken WYATT	- Dept. of Trade & Industry
John KENNY	- Dept. of Environment
+ 2 OTHERS	- Dept. of Environment
Steve CHANTRELL	- Monsanto (PR Dept.)
Alf VODDEN	- "
John CHURCHILL	- "
John HAGGART	- "

PURPOSE of the meeting to discuss input of UK delegation to October 3rd OECD Meeting in Paris.

The October 3rd Meeting was called by the OECD at the request of the US delegation who acting under strong political pressure in the USA, felt that it would take too long for any results to come from the normal Sector Meetings on Occurence and Significance of Chemicals in the Environment.

The US delegation were concerned about the health hazards which might arise out of uncontrolled trade in PCB's and were worried about the current attitude of the French, Spanish and Italian manufacturers.

The Sector members were upset by the calling of this Oct.3rd Meeting since they had planned a normal meeting (which would include PCB's) for November.

7. The OECD documents included notification of proposed legislation from the USA and enacted legislation from Japan, Norway and Sweden.

A preliminary report from the Sector Group (no copies available) listed a number of PCB accidents - one in Japan (1 million poison cases !) and the rest in the USA (6 or 7).

It is felt that the OECD meeting will want to concentrate on regulating in some way the sales of PCB's from the PCB manufacturers and also to concentrate on the trade aspect.

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PCB-ARCH-EXT0371319

We reviewed Monsanto's withdrawal policy in the UK and on the Continent which will mean that as from Nov 30th, 1972 (when we cease sales of German Mine fluids) we will be selling only for capacitors and transformer applications right across Europe.

We advised them of what we know about our competitors' attitude.

We explained that the capacitor application used lower chlorinated (42 % chlorine) PCB's and that the transformers needed added fire resistance and used higher chlorinated materials.

It was thought that fluid capacitors containing the lower chlorinated biphenyls were likely to be less of an environmental problem than fluid from transformers.

The ministry prefers voluntary control schemes such as the Pesticides voluntary control scheme rather than licensing or registration which would require legislation.

Presst suggested that formalising our present arrangements of voluntary withdrawal retaining selected end-users would be a benefit in the eyes of the OECD. He would envisage a document stating the position (Apparently a similar document exists for Pesticides).

Kenny is interested in data relating to PCB's to be considered in light of the draft bill for disposal of chemical wastes due October 1973.

If we consider that lower chlorinated materials (used for examples in small capacitors) do not require as stringent disposal regulations as in the case of fluids from transformers then we need to justify this.

1. By stating the size of the problem, volume of PCB's used in capacitors for fluorescent, motor start and power factor.

2. Indicate from which size upwards it is possible to collect PCB's.

3. Give data on biodegradation and likely effect of annual load in the environment. Indicate dilution effect etc.

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PCB-ARCH-EXT0371320

Fluid from transformers he feels will all have to be incinerated.

He questioned us about Purle Bros. How did we know they were running a tight ship ? Alf reported his recent visits and his analysis of products of combustion. Data on this work, which proved that incineration is an effective way of disposing of PCB's, needs to be sent to Kenny.

Alf mentioned that Purle can at present handle filter cake and other dispersible solids but that equipment to handle capacitor windings will not be ready for another month.

Presst and Wyatt will be the two UK representatives at the OECD meeting in Paris on Oct. 3rd. I advised them that this was the same data as the ANSI C 107 meeting by strange coincidence so that we wouldn't unfortunately have the ANSI guidelines available.

JN HAGGART

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