Monsanto

Disposal

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SUBJECT : PCB Transformer Fluids

REFERENCE : CEA 3510

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Reference our conversation last week at the Environmental Workshop concerning the above subject.

As I stated, rather than drain the six transformers (which are perfectly sound containers) and create at least 200 drums of PCB liquid, why not use the transformers themselves as storage containers.

The question is, would this then be in violation of the PCB storage regulations?

Why can't these six transformers be considered spares? They may not be as efficient as the new transformers, but are in working condition because they are currently in service. As long as the transformers have not failed and are in a serviceable condition, why can't they be stored in a protected area as is using the transformers as the storage containers.

To be carried as spares, we could not declare the units as retired; so they must still be carried on the books.

I know this introduces an element of risk, but I believe there is much less risk in six storage containers than in 200.

I would appreciate any comments you may have on this subject.

M. F. Weishaar

MFW:ku

11/15/79
Advised MFW that term "in service" not defined. However, to the extent they were still usable + could be used as spares, seem to have an argument that not yet waste.

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