

Monsanto

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F-Environment

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DATE December 31, 1986

SUBJECT PCB Issues-Dec. Highlights

REFERENCE :

TO W. J. McCarville - F1WH

cT. Bistline/D. Snively - B3SD

G. F. Fort - F3EC

B. Gilhousen/R.Allen/P.Smith - B3SH

R. L. Harness - C2SB

R. G. Kaley, II - F1WH

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M. A. Pierle - G4WT

J. H. Senger - F4EA

~~T. J. Slocum - F3EB~~

I. Regulatory Issues

- TSCA - The Spill-Clean-Up Consensus Rule was reviewed in-house in EPA by Lee Thomas on December 8. According to information "leaks," the proposal will be issued as an ANPR in January 1987, "essentially as proposed." However, a couple of broad policy aspects are still being cleared up before any official release of information. Thomas supported the negotiated rule/policy as the "way to go."

II. Plants/Compliance

- Lloyd Boesch proposed to Detergent Division Plant Managers that they formally develop plans to achieve "PCB-free" status and/or assure maintenance of its status if already achieved. This key management support will help expedite PCB equipment removal and records audit for Detergent Division Plants. Hopefully, other divisions will implement similar programs.
- Everett - High levels of PCBs were discovered in parts of the Therminol reactor system when it was being dismantled. Plant staff have taken steps to dispose of equipment in a proper manner. When this item is removed, Everett will be free of PCB equipment and possible new sources of PCB material.
- General - PCB plant audits will be scheduled as resources permit in 1987 1) to assure regulatory compliance prior to TSCA audits, and 2) prior to notification of EPA of achieving PCB-free status for closing of a PCB storage-for-disposal facility. This will start the clock ticking for the 5-year record maintenance requirement under TSCA.

III. Miscellaneous

- The Pyrochem Incinerator (Coffeyville, Kansas) was visited with Art Heintz for Outside Processors audit. The facility is jointly owned

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by Westinghouse and National Electric, Inc. Final test burns are in progress and EPA, PCB permitting is expected within six months. Currently, Pyrochem is operating on a test permit.

- Review of the IARC PCB monograph for carcinogenicity is in progress. The review includes animal lab studies and human epidemiological studies. Drs. Levinskas and Gaffey are taking the lead in-house.
- The PCB Workplace Exposure Control Guideline originally published by CED was reviewed and updated to November 1986. Copies are being sent to holders of the WECG manuals, as well as all site PCB coordinators. The guide reviews all current federal PCB rules and recommended Monsanto practices.
- Media inquiries/responses increased significantly this month. No pattern was established as calls originated nationwide.

SJC JRM
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