Monsanto

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DATE: October 30, 1991

SUBJECT: MONTHLY REPORT - PCB ISSUES
OCTOBER HIGHLIGHTS

REFERENCE:

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I. Regulatory Issues

- The CMA PCB Panel and the Industry PCB Consensus Group filed supplementary comments with EPA in the PCB Disposal ANPR, proposing a generic PCB spill clean-up rule to include old (prior to 1987) PCB spills. The proposal specifically covers issues related to PCB clean-up levels in Superfund and RCRA sites. In addition, proposals requested by EPA for certain specific PCB issues such as storage and disposal of mixed PCB/RCRA, waste use authorization for R&D using small quantities of PCBs, and alternative disposal options were covered.

- The CMA PCB Panel continues to be plagued by financial problems. We were unsuccessful in obtaining generic CMA funds from Legal, EMC, the Superfund Task Group, or any other CMA source. If no additional funds are forthcoming, the CMA PCB Panel will be forced to "sunset" in the middle of this rulemaking when our funds (less than $50k) are expended - probably as soon as mid-December.

- In Europe, the EEC working group approved a proposal that would establish the 50 ppm cut off level as the de minimis level for hazardous concentrations of PCB in wastes or other materials in EEC countries.

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II. Plants

- The Soda Springs Plant received a "Notice of Case Closure" with "no apparent violations of the PCB Regulations" for the PCB inspection by EPA Region X in June, 1991. This was a very tough inspection which included a visual inspection of every transformer in the plant, a detailed look at the Plant's PCB Records, and transmittal of copies of selected PCB records to the Region X office in Seattle. This is the first time a "notice of case closure" has been received at any Monsanto site regarding PCB issues. The plant became "PCB-Free" in 1990.

III. Miscellaneous

- G. W. Mappes presented a paper entitled, "Small Scale Laboratory Study of Quicklime Treatment of PCBs", at the EPRI 1991 PCB Seminar. Representatives of the EPA and the Lime institute agreed with the conclusions of the paper and it was well received by the audience. There is a consensus in the environmental community that the "lime treatment" reduces the level of PCBs by encapsulation or volatilization but does not destroy significant amounts of PCB by chemical reaction. EPA OTS staff indicated that a process for "alternative disposal" of PCBs might be developed based on this technology and would be considered in the current ANPR, if proposed.

- Monsanto and ALCOA management met in Washington, DC to discuss ways to cooperate in pursuing environmental issues, including PCBs. The parties agreed to information exchange and to try and initiate co-operative actions. Another meeting may be held in 6-8 weeks.

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