

Monsanto

FROM (NAME, LOCATION, PHONE) J. H. Craddock (4-4764) - A2NE

DATE: August 9, 1991

cc: R. G. Kaley - A2NE
G. W. Mappes - A2NE

SUBJECT: Monsanto ANPR Comments for
Rulemaking on Disposal of PCBs

REFERENCE:

TO: T. M. Bistline - E2NP
M. W. Foresman - G4WT
G. W. Fort - G4WA
L. W. Higley - E2NK
B. J. Gilhousen - E2NK
W. J. McCarville - A3NA
M. A. Pierle - A3NA

Attached for your information are Monsanto comments on the new PCB Disposal Rule ANPR. More in-depth comments, (25 pages), were submitted today by the Industry PCB Consensus Group in which we play a leading role. Supplementary comments will follow as we promised.

We had a detailed meeting with high level OTS management, Wednesday, August 7, on this subject and it appears we have an excellent opportunity to work with the Agency as we did on the 1987 New Spill Clean-Up Policy to work for technically feasible, cost effective flexible standards that will carry over to Superfund and RCRA sites.

The timing is short - targeted Federal Register Date for Proposed Rule, May 11, 1992; Final Rule one (1) year later.

We will need to commit resources to achieve a satisfactory rule but after discussions with CMA and other trade association PCB groups, I think we have an excellent chance of success.

I have asked David Zoll, CMA's General Counsel, for assistance - financially, \$50k - \$75k for outside counsel funds and support for the undertaking at CMA. Zoll agreed to review the issue and request soon. I will need to call upon you all for support, both financially and morally as we proceed.

I welcome the opportunity to discuss this issue at your convenience.

