Monsanto

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DATE : July 16, 1982

SUBJECT :

REFERENCE :

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A preliminary survey to assess the impact of the proposed incidental PCB generation rule for Closed and Controlled Waste Processes on waste disposal of Monsanto processes, identified previously as possibly generating incidental PCB's, was completed.

This proposed rule would require that all wastes from such processes in which PCB's were quantifiable, using a specified capillary column GC coupled to an electron impact mass spectrometer, be disposed of at EPA approved PCB facilities, i.e., landfills and incinerators.

Forty-six Monsanto processes were surveyed. Quantities of waste currently produced by these processes include 5.3 million pounds per year to landfill and 16.6 million pounds per year to incineration. (These go to EPA approved RCRA facilities currently at a substantially lower cost than "PCB facilities.") Another 300,000 pounds per year of this waste already is disposed of in EPA approved PCB facilities.

In addition, two of these processes generate 22 million pounds per year of sludge which might have to be disposed of as PCB materials. The survey did not evaluate aqueous streams from these processes which are currently sewered but potentially could require PCB disposal treatment.

This proposed regulation would increase waste disposal costs for several of these processes significantly and possibly make several of them economically unviable.

We have been and will continue to comment on and oppose the proposed incidental PCB generation rules individually as Monsanto Company and as a member of the CMA PCB Special Projects Group.

J. H. Craddock

IN - 10 (REV. 8/77)
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