1,5

NEMA
WWAG

DEC 12 1991

12/15/91

PRIVILEGED AND CONFIDENTIAL

M E M O R A N D U M

TO: Timothy Hardy
Patti Franco
Kirkland & Ellis

Dr. John Craddock
Monsanto Company

FROM: William J. Walsh

DATE: December 10, 1991

RE: Supplemental Comments To The PCB ANPRM Regarding Sediment Cleanup Criteria

---

Attached is a copy of the latest draft letter to EPA opposing their use of the equilibrium partitioning method to develop sediment criteria for PCBs. I have incorporated all of your comments. Also included are copies of the comments made to EPA's Water Program concerning the equilibrium partitioning method. It is interesting to note that several of the comments from within EPA and other federal agencies were negative. My overall sense from skimming the comments is that most comments had reservations about or outright opposed use of the method as proposed by EPA.

If you have any questions, please give me a call.

cc: Marc Machlin, Pepper (w/o second attachment)
Elizabeth Festa-Gormley, CMA (w/o second attachment)

For Distribution by CMA
CHEMICAL DIVISION
From E Festa Gormley
Ref. No. PCB 68/91-003
12/30/91

bcc: Geraldine Scoll, Cabot (w/o second attachment)
Wayne Reiber, Cabot (w/o second attachment)
Mitchell Burack, Pepper (Phil.) (w/o second attachment)
David Richman, Pepper (Phil.) (w/o second attachment)
✓Philip Boxell, Conrail (w/o second attachment)
Thomas Wilzcak, Pepper (Detroit) (w/o second attachment)

PCB-ARCH-EXT0371388