Monsanto

FROM
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DATE : March 1, 1984 cc. J. G. Nassif - E2ND

SUBJECT : Monthly Report - February 1984
PCB Surveillance

REFERENCE :

TO : W. B. Papageorge

HIGHLIGHTS

- New Regulations

Incidental Manufacture

Monsanto Company comments on the proposed incidental PCB generation rule were finalized and submitted to the Agency February 3 with input from appropriate staff and operating unit departments.

Opposition to certain portions of the consensus proposal was noted in several written comments. Strong opposition was particularly attributed to EPA Region V Administrator Adamkus who described the negotiated rule as "completely unacceptable."

PCBs In Electrical Equipment

EPA staff informally told us that a new PCB transformer rule scheduled for publication March 15 in the Federal Register will focus on PCB transformers as polychlorinated dibenzo-furan sources. The rule will not focus on dioxins from the dielectric fluid, trichlorobenzene component because TSCA Section 6(e) can only regulate PCBs.

- [redacted]

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DETAILS

1. Objective

Influence more reasonable regulation of PCBs by State and Federal agencies.

Status

- New U.S. PCB Regulations - Incidental Manufacture

  Reply comments on behalf of Monsanto Company for the new incidental PCB regulation were completed with input from various staff departments and operating units and submitted to EPA February 3.

  No formal hearing was requested by any parties or the general public.

  Opposition to certain provisions of the consensus proposal as published by EPA was noted in several written comments to the Agency. Region V Administrator Adamkus expressed particular opposition to the rule and described it as "completely unacceptable." Adamkus asked EPA officials in Washington to hold hearings but failed to request hearings in public comments. Because of this failure to comply with established procedure, Washington officials ruled no hearings would be held and comments within the Agency would be handled on an informal basis.

  EDF/NRDC parties to the consensus rule filed minor comments but support the rule.

- New Electrical Equipment Rules

  EPA staff informally told us that a new PCB transformer rule scheduled for publication March 15 in the Federal Register will focus on PCB transformers as polychlorinated dibenzo-furan sources. The rule will not focus on dioxins from the dielectric fluid, trichlorobenzene component because TSCA Section 6(e) can only regulate PCBs.

2. Objective

[redacted]

Status

- [redacted]

3. Objective

Provide guidance to Monsanto facilities for cost effective compliance with PCB rules and regulations.

Status

- Research Triangle Park Site Sale

  Low levels of PCB, identified at the RTP site, continue to raise emotional issues and complicate the sale and "clean-up" of this property.

- Soda Springs Plant Transformer Disposal Issue

  The alleged PCB transformer disposal incident at Soda Springs previously reopened as part of a Civil action by the EPA against the disposer relating to clean-up has "cooled off."

A motion to quash subpoenas and document requests for Monsanto Company and employees at Soda Springs was granted by the judge.

- Trenton Plant Transformer Leak

A PCB transformer at Trenton had a few drops of PCB material "leak" from the unit. Under latest PCB regulations, any quantity of PCBs leaving the surface of the unit constitutes a leak. Appropriate clean-up and remedial actions were taken.

Recommenations to retire and remove PCB units from this plant were made and will be included in capital forecasts.

J. H. Craddock

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