

Monsanto

FROM
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DATE : September 8, 1982

cc: P. S. Park - G3WB

SUBJECT : New PCB Electrical Equipment Rules

REFERENCE :

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The EPA published the final PCB electrical rule covering "totally enclosed" electrical equipment August 19, 1982 in the FEDERAL REGISTER. This rule becomes effective September 24, 1982.

The major impacts of this rule on Monsanto will be based upon the following requirements:

- 1) Phaseout of PCB transformers in areas that may pose a risk to food or feed products by October 1, 1985.
- 2) Phaseout of PCB capacitors in areas that may pose a risk to food or feed products by October 1, 1988.
- 3) Scheduled inspections comparable to the current Interim Measures Program.
- 4) Record keeping for inspections and maintenance.

In addition, the current rule defines disposal to include any leaks.

The required phaseout of PCB equipment in areas that pose a risk to food and feed, simply put, incorporates

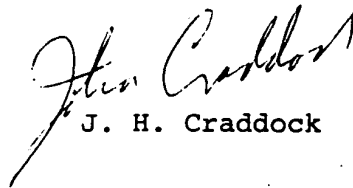
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provisions of proposed FDA and USDA rules into TSCA. Most Monsanto plants have been following our previous informal recommendations to replace such equipment in an orderly, planned program as soon as possible.

Details of the rule are attached in the following FEDERAL REGISTER announcement.

The Environmental Defense Fund is expected to challenge these new rules on the basis they do not regulate PCB's strongly enough.

Please communicate these rules to your affected operating units.


J. H. Craddock

/dkr
Attachment

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