Monsanto

FROM (NAME—LOCATION—PHONE): J. H. Craddock G3WG 4-4783

DATE : January 24, 1985 CC:

SUBJECT : EPA Spill/Clean-up Rating for PCBs

REFERENCE :

TO :

M. Pierle - G3WG
W. McCarville - G3WD
J. Wilson - G3WD
J. Nassif - E2NG
P. Park - G3WB
M. Mullins - G3WG

Attached is the "technical Survey" on sampling and analytical methodology EPA commissioned relative to PCB Spill/Clean-up.

The document goes far afield from a technical survey as you can see. Rather than recommending clean-up levels and procedures based on available practical technology, it just reiterates requirements from the consent decree against Commonwealth Edison or the old NIOSH PCBs criteria document.

Pertinent items are:

1. P. 4, Sec. IV EPA Policies for Clean-up of PCBs. No guidance is given now nor any preview of their future proposals.

2. P. 61, Sec B, Regional Needs (1) "How clean is clean?". A phone survey indicates 9 of 10 Regions currently use "background" as the clean-up goal.

3. P. 4, Sec. III Recommendations.... (6) A working conference including all EPA Regions will be held (in 6-8 weeks) to finalize guidelines document for PCB Spill/Clean-up.

Dave Hanneman of OTS said their target date for a PCB Spill/Clean-up document of some sort is May 27.

EDF expressed disappointment with the MRI document because they "believe it will not expedite clean-up at a practical level". Ellen Silbergeld has agreed to meet with the CMA PCB Group, February 5, to discuss a concensus approach to establishing a spill clean-up guideline or regulation at a higher practical level than background. Prior discussions with EDF on this subject were in the average 25 ppm level range for defining "clean".

Your thoughts on this subject would be appreciated (before January 31, if possible).

J. H. Craddock

/vs
Attachment

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