PCB Issues at Monsanto Manufacturing Meeting
J. H. Craddock

On January 21, the EPS-PCB coordinator sent out the yearly request for the Corporate PCB Inventory and to remind plants/sites of the legal requirement to prepare the "Annual Document" for PCBs required by TSCA. This request was sent to plant/site managers to insure receipt and key plant management attention. Plant managers were urged to review the Annual Document for their site and to check their progress in replacing and disposing of PCBs and old PCB equipment, particularly PCB electrical capacitors and transformers.

PCBs will be an EPA emphasis area for enforcement activities again this year. An estimated 80 percent of EPA enforcement activities are scheduled for PCB inspections. Several Monsanto environmental audits this past year found PCB equipment not inventoried, marked, etc. as required by law. Some sites reported previously to be free of all PCBs and PCB equipment were found to actually have PCB electrical equipment in service. These incidents would be serious violations and result in citations and "stiff" fines if found in an EPA inspection.

Craddock suggests that the Manufacturing Council and plant managers in addition to DEO's and environmental control managers emphasize the need for a close look at PCBs, related equipment, and PCB records required for compliance at plant sites. At times staff treat the PCB issue as if it were behind us, but that is not correct.

Two new PCB regulations are in the regulatory mill now which are potentially very costly and labor intensive (for frequent inspections, record keeping, etc.).

PCB issues at manufacturing and other Monsanto sites where any detectable PCBs are present will be a serious environmental and legal issue for the future.

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