

Monsanto

FROM
(NAME-LOCATION-PHONE) J. H. Craddock - B3NA (4-4764)

DATE : August 13, 1984

SUBJECT : PCB Disposal Requirements

REFERENCE :

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R. L. Harness - C2NA
F. E. Kearney - E2SA
W. B. Papageorge - B3NA

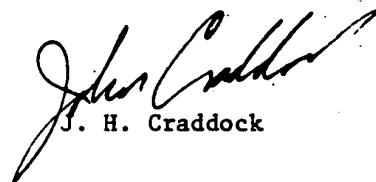
TO : R. T. Allen - G3WB L. P. Paradis - E1SA
M. R. Foresman - B3NA D. B. Redington - C2NJ
G. F. Fort - F3EC P. H. Smith - G3WB
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Current PCB disposal regulations require PCBs to be removed from storage and disposed of within one year from the date it was first placed in storage.

However, as you recall, EPA issued a policy statement last fall which requires PCBs to be removed from storage and shipped to the waste contractor for disposal within 270 days (9 months) of placement in storage. The policy then allots the remaining 90 days to the waste contractor for his disposal activities. (Waste contractors are requiring these dates be met and in many cases marked on drum labels and manifests.)

This note is to remind you to ask plant staff to check PCB storage dates and schedule removal and disposal with hazardous waste contractors well in advance of the mandated 270 day removal date. (If you waited to comply with the benchmark January 1, 1984, removal date for PCBs specified in the original May, 1979 PCB regulations, September 26 is your final site removal date.)

Rollins Environmental Services has told us that disposal capacity could be tight around the deadline dates. Ample lead time is needed to accommodate Monsanto needs, especially if small drum lots, less than truckload are being handled. Transportation scheduling is a major factor.


J. H. Craddock

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