M E M O R A N D U M

J. Alley
Please speak

December 23, 1976

SUBJECT: EPA RULES FOR PCB LABELING & DISPOSAL

TO: EIA PCB AD HOC COMMITTEE

On behalf of the EIA Ad Hoc Committee, I participated in the meeting on December 20 at EPA Headquarters in Washington. Attached is a copy of the prepared statement which I gave orally, and left with George Wirth of EPA. Also attached is a copy of the agenda prepared by EPA.

Norm Butterworth of Aerovox, who attended as an observer, is preparing notes on the meeting for distribution to our Committee. In the meantime, I offer my opinion that the EPA people have not reached decisions on rules for Labeling and Disposal. They are grappling with the problem, appear to be giving serious consideration to the Michigan Rules and the ANSI Guidelines, and are, hopefully, going to be realistic in what they issue.

Happy Holidays

N. Ray Clark

NRC/h
Encs:

CC: LR Patterson

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PCB's

Panel Discussion

Monday, December 20, 1976
Room 2117, Waterside Mall
401 "M" Street, SW, Washington, DC 20460

10:00 AM to 4:30 PM

AGENDA

10:00-10:15 - Opening - Kenneth L. Johnson, Acting Assistant Administrator for Toxic Substances

Introductions and Background - George F. Wirth, Office of Toxic Substances, EPA, Chairman, PCB's Work Group

10:15-11:15 - Brief statements by panel members if desired.

11:15-4:30 - Discussion:

Disposal

Incineration

- Is incineration the optimum disposal alternative?
- Does adequate incineration capacity exist?
- Where are the "acceptable" incinerators?
- What kinds of materials can be successfully incinerated?
- What are the interstate shipment problems?

Landfills

- What is the role of landfilling in PCB disposal?
- What are the technical requirements for an acceptable landfill?
- Where are the "acceptable" landfills? What are their capabilities?
- What are the interstate shipment problems?
- What are the views on entombment?

Storage

- Is there a need for storage prior to final disposal?
- How long should interim storage be permitted?
- Where should storage be provided? By who?
- What is acceptable storage?

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Scope

- What items should be controlled for disposal?
- What are the size or quantity cutoff?
- Who pays for disposal?

Labeling

- What items should be labeled?
- What are the size or quantity cutoffs?
- What should a label contain?
- Who should pay for the labels? Who is responsible for attaching them?
- How should requirements be enforced?

Manufacturing and Distribution Bans

- What constitutes "totally enclosed manner"?
- How should "sold for purposes other than resale" be allowed?

Definition

- What is a PCB?

Exemptions

- What possible exemptions should be considered?

Imports/Exports

- How should imports be controlled?
- Should exports be allowed?

12:15-1:30 - Lunch

2:45-3:00 - Break

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