Monsanto

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

DATE : June 1, 1983

cc.

SUBJECT : Monthly Report - May, 1983
PCB Surveillance

REFERENCE :

TO : W. B. Papageorge

HIGHLIGHTS

New Regulations

- Negotiations between environmental and industry groups resumed to develop a consent order to resolve the PCB electrical equipment (transformers and capacitors) rule challenge.

  Edison Electric Institute (for public utilities) and Environmental Defense Fund are the chief antagonists. CMA was asked to rejoin the discussions since our negotiations with EDF on incidental PCBs turned out satisfactory.

Health And Toxicity Data

- EPA released recent data from their long term National Human Adipose Tissue Survey, with fanfare of a press conference, showing a "sharp decline" in the percentage of U.S. population having PCB levels greater than 3 ppm in their adipose tissue. The PCB tissue level declined from about 10% in 1977 to less than 1% in 1981.

- Center for Environmental Health of the Centers for Disease Control (CDC) announced that they will convene a meeting June 28-29 to "review and discuss current literature related to the toxicity and environmental occurrence of polyhalogenated aromatic compounds." The list of participants is not yet available; however no Monsanto staff have been invited to participate and no other industry representatives are known at this time. Several environmentalist representatives are known.

Plant Activities

- The Corporate PCB inventory was essentially completed. Preliminary data indicates significant progress in disposing of old PCBs and related PCB electrical equipment.

- Assistance was provided to the Anniston Plant to develop a joint program with Alabama regulatory officials for sampling and analyzing sediments for PCBs from Choccolocca Creek as part of a flood control project.

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SUMMARY

1. Objective

Influence more reasonable regulation of PCBs by State and Federal agencies.

Status

New PCB Regulations -

Negotiations between environmental and industry groups resumed to develop a consent order to resolve the PCB electrical equipment (transformers and capacitors) rule challenge.

Edison Electric Institute (for public utilities) and Environmental Defense Fund are the chief antagonists. CMA was asked to rejoin the discussions since our negotiations with EDF on incidental PCBs turned out satisfactory.

EEI and EDF are stalemated on electrical equipment issues (which will have no significant impact on the chemical industry either way).

However, EEI has made spill clean-up part of the consent decree package which will effect Monsanto and many other non-utility parties significantly. EEI is doing a losing job of negotiating and has EDF trying to make the spill clean-up regulations significantly tighter than CMA had gotten tentative EDF agreement to a year ago (August 1982). EDF has moved the clean-up level from the 25-50 ppm level (solids) to the low ppm or perhaps ppb range.

2. Objective

Provide guidance to Monsanto facilities for cost effective compliance with PCB rules and regulations.

Status

The Corporate inventory of PCBs and related equipment was essentially completed. Preliminary results indicate significant progress was made in disposing of old PCBs and equipment. Over 15 Monsanto sites (of 54 surveyed) are now "PCB free" locations - no PCB electrical equipment in use or PCB materials in storage for disposal.

Each site inventory summary is a required part of the "PCB annual document" mandated by TSCA which must be prepared annually by July 1 for the preceding year.

Assistance was provided to the Anniston Plant to develop a storage and joint program with Alabama regulatory officials for sampling and analyzing PCBs from Choccolocca Creek as part of a flood control project.

Alabama officials want a cost-effect sampling/analysis program to insure that dredge spoils from the flood project meet regulatory requirements (less than 50 ppm) for disposal.

Paul Michael (MIC Environmental Sciences) and Tom Hoogheem of Corporate Research are developing the protocols for the plant for review by the State official.

3. Objective

Provide initiatives to reduce public hysteria and develop more reasonable understanding of PCB health and environmental effects.

Status

EPA released recent data from their long term National Human Adipose Tissue Survey, with fanfare of a press conference, showing a "sharp decline" in the percentage of U.S. population having PCB levels greater than 3 ppm in their adipose tissue. The PCB tissue level declined from about 10% in 1977 to less than 1% in 1981. Previously, from 1972 to 1977, PCB tissue levels peaked, e.g., 2.7 to about 10%.

High EPA officials stated that "this is a dramatic example of the improvements that environmental regulations are bringing us."

The official neglected to point out, however, that the PCB ban regulations only became effective July, 1979 and that this result most probably is due to voluntary industry restrictions by Monsanto and others in 1971-72.

The San Francisco Chronicle requested PCB toxicity and health information to support a story regarding a "major explosion" in electrical apparatus in a high-rise building in San Francisco this week. However, no major news stories reported this incident in the St. Louis press. Major press/media coverage was given the incident on the East Coast (e.g., New York and Washington, D.C.) and national television news featured the incident (i.e., CBS).

J. H. Craddock

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