

MONSANTO

From: J. H. Craddock/G. W. Mappes - A2NE - 4-4764/3344

Date: January 3, 1991 cc:D. R. Bishop - A2SP
T. Bistline/M. Newport-E2NP
Subject: PCB Issues - December Highlights G. F. Fort - G4WA
B. Gilhousen/P. Wright-E2NK
Reference: R. L. Harness - C2SB
R. G. Kaley - A2NE
TO: W. J. McCarville - A3NA F. E. Kearney - G4WT
M. A. Pierle - G4WT
J. H. Senger - A3NA
FILE

I. Regulatory Issues

- US EPA formally announced the plans for an ANPR for a so called "mega-amendment" to the existing PCB rules that we have been expecting. Tony Baney, Chief of OTS Chemical Control Branch, will discuss EPA's plans with industry representatives of the "PCB Consensus Group" January 10 and solicit comments and suggestions.

Several items in the "mega-amendment" are particularly of interest to Monsanto, e.g.,

- disposal of high volume, low PCB concentration solid and liquid wastes at Superfund sites (partly triggered by the BROS site petition)
- "how clean is clean" standards for old spills, including Superfund sites
- possible implications for sludge and/or sediment clean-up levels

II. Plants

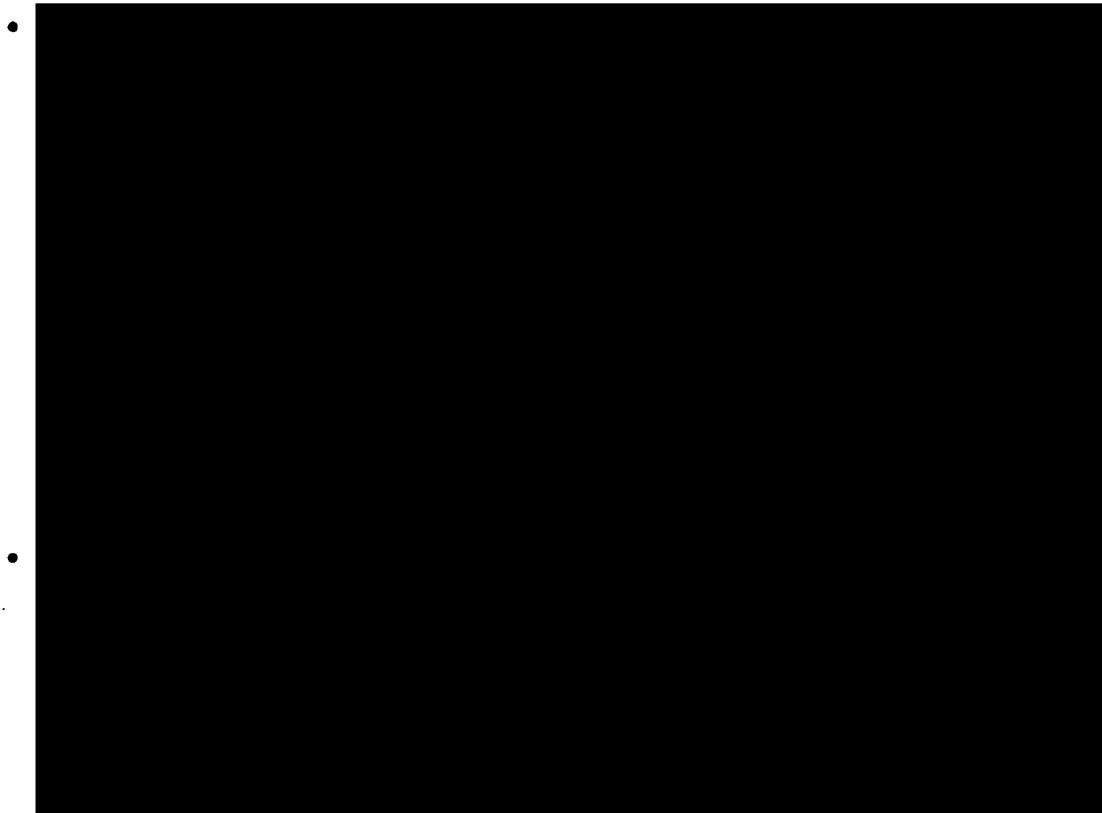
- US EPA completed sampling at the St. Charles Ag Farm Fluids Testing Site. Samples were split with Monsanto's Ag staff and are being analyzed. Samples were taken with violation of the sampling protocol by the contractor, even though most original screening samples found no PCBs. (The contractor wanted to spend the appropriated funds).
- Monsanto started out 1990 with ten plants which still had PCB electrical equipment. Thanks to the good efforts of the environmental staff at Dayton, Luling, Nitro, Pensacola, Soda Springs, and Trenton to push contractors to finish replacement and retrofilling, as well as testing and documenting, Monsanto will only be left with four plants with PCB electrical equipment.

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II. Plants (cont'd)

Chocolate Bayou, Decatur, Fayetteville, and Indian Orchard all have plans to become "PCB Free" in 1992, which is the internal Monsanto goal. Fayetteville is near to meeting this goal and will likely be "PCB Free" in 1991. The other three plants will have to strictly adhere to their plans and will have to have firm environmental budgets to meet their goal. The increasing strictness of the PCB regulations and the increasing size of the fines for not meeting the regulations make it well worth the time, effort, and expense incurred by the remaining plants to become "PCB Free".

III. Miscellaneous

JHC / G.W.M.
J. H. Craddock/G. W. Mappes

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