For equipment posing a risk to food and feed products and specifically establishments whose products will be ingested by humans or animals, a more stringent program is required as outlined below. This would specifically apply to all FDA inspected ingredient manufacturing facilities. However, packaging materials manufacturing facilities are covered under the three-month inspection program.

1. A visual inspection of each PCB transformer (above 50 ppm PCB) at least once every week.

2. All leaks must be recorded and reported to EPA within five business days from the day the leak is observed. (Please notify Phocion Park and me before notifying EPA.)

3. With respect to any "moderate leak" (defined as one where PCB's have run off or are about to run off the external surface of PCB unit), repair or replacement of the transformer must be commenced within two days of date of detection.

4. Records containing inspection/servicing history as described previously must be maintained for three years.

The effective date of the Interim Measures Program is May 11, 1981, and must be adopted to continue use of PCB transformers. All food/feed additive manufacturing units must have the first inspections completed by May 18.

Read the detailed procedures and definitions carefully and phone Phocion Park or me if you have specific questions.

Recordkeeping under this regulation is in addition to the annual reporting requirement, but may probably be included in that requirement to alleviate duplication of effort.

Note to recipients: Please transmit this information to responsible personnel in your operating unit.

J. H. Craddock

jb
enclosure