MONSANTO

From
(Name-Location-Phone) J. H. Craddock - A2NE - 4-4764

Date : July 6, 1987 cc: P. R. Michael-A2NE

Subject : Burning PCBs <50 ppm in Used Oil-
(JFQ Proposal) and other new PCB Regs

Reference :

TO : R. T. Allen - E3NK
M. R. Foresman - G4WT
P. H. Smith - E2NK

Attached for your information is EPA's latest proposed PCB regs to "clarify" the July 1984 Inadvertent Rule and cleanup several loose ends. This proposal will be published in the Federal Register this week.

RTA and MRF note especially the requirement for burning low level PCB oils <50ppm. This will impact Specialty Chemical Division's plans to burn low level PCB heat transfer fluids at Queeny.

PHS note the definition of how clean is clean for equipment that was contaminated prior to the recent spill cleanup rule (Apr. '87).

Let Paul Michael and me know if we need to discuss any of these prior to filing comments. CMA will definitely comment in the affirmative since we negotiated the compromise.

J. H. Craddock

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