October 25, 1978 H. B. Hudgens 1797 w/encl.

Disposal of Unused Transformers
Containing PCBs

J. B. Schneider - AA2C

You have asked in your memorandum to me dated October 23, 1978, about Monsanto's position on the above. Please note that to the extent such transformers contain a mixture of 0.05% (on a dry weight basis) or greater of PCBs and are to be discarded, their disposal is governed by United States Environmental Protection Agency (EPA) regulations promulgated pursuant to the Toxic Substances Control Act. Enclosed is a copy of these regulations for your reference.

Under these regulations, PCB transformers must be marked and stored in accordance with the provisions of Section 761.20 and 761.42 and disposed of either in an EPA approved incinerator or in an EPA approved chemical waste landfill in accordance with Section 761.10(c).

Please don't hesitate to call me if you wish to discuss this matter further.

Peter H. Smith

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Enclosure

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