Monsanto

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SUBJECT: PROPOSED PCB REGULATIONS

REFERENCE

TO : J. C. Weber

1. Attached is a copy of a proposed PCB regulation prepared by Versar. This copy was supplied to me by Mallory.

2. Your attention is invited particularly to the following:

Page 6 (Definition of PCB Article Container and PCB Container)

Page 7 (Definition of storage)

Page 8 (Definition of transport vehicle)

Pages 9-14 (Sec. 761.10 - Incineration) - Monsanto incinerator?

Page 23 (Subparagraph (5)) - Monsanto tankcar and drums?

Page 24 (Decontamination) - Tankcar fleet?

Page 27 (Subparagraph (e)) - Drums emptied at incinerator?

Pages 29-32 (Marking of PCBs) - Monsanto tankcars and drums?

Pages not numbered (Subpart D) - Monsanto tankcars and drums?

Pages 34-35 (Records and monitoring by incineration facilities) - Monsanto incinerator?

Pages 38-39 (Storage Facilities prior to disposal of PCBs) - Monsanto incinerator?

Page 40 (PCB Users) What about Monsanto-owned transformers and capacitors which contain PCBs?

DSW 310456

3. I have highlighted above some potential impact areas where these regulations might affect Monsanto. There may be other ways the regulations will affect us.

4. It appears that most of the requirements under these regulations would become effective January 1, 1978. Transport vehicles must be marked appropriately after March 31, 1978 - see page 31.

5. What early action should Marketing take in view of these proposed regulations?

J. A. Alley

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Enclosure

DSW 310457