

FROM (NAME-LOCATION-PHONE) J. H. Craddock - St. Louis A2SA 4-4764

DATE : June 2, 1982
SUBJECT : MAY MONTHLY REPORT
REFERENCE :
TO : R. S. Nelson - A2SA

cc. C. F. Callis - B3CA
S. G. Collins - A3NC
J. G. Nassif - E2ND
L. J. O'Neill - A3NC
P. S. Park - G3WB

PCB SURVEILLANCE PROGRAM

EDF vs. EPA Lawsuit/New PCB Rules

The EPA Mini-Symposium to review PCB health and environmental effects data was held May 12 and 13 in Bethesda, Maryland. About 200 scientists attended the meeting.

EPA was represented by a few low-level technical staff. (Reportedly, EPA managers and staff levels having "policy influence" were requested by the "Agency" to not attend the meeting.)

The tone of the meeting was distinctly different from past such meetings primarily because of the human epidemiology data. Most scientists agreed that PCB's are not the scare chemical and deadly menace purported to be in the late sixties and seventies. However, a staff member of EDF summed it up by saying we need more data to show it's "harmless." (The industry position stated at the meeting was that PCB's should be treated as any other chlorinated hydrocarbon; it's not a human cancer-causing agent, but does require proper use, handling and disposal.)

Ms. Jackie Warren, NRDC/EDF attorney, seized the opportunity at the last session to make political charges against EPA and industry and personal attacks on scientists working directly for or consulting for industry and trade associations.

Ms. Warren stated publicly in the press several times that if EPA attempts to use the new health effects data in the rulemaking NRDC/EDF will file lawsuits.

New PCB Rules

Comment period for the "totally enclosed" PCB electrical equipment rule closed May 24. Over a hundred comments were filed, including CMA's. (Monsanto participated in the CMA filing.) Formal hearings have been requested and are scheduled for four days beginning June 7. CMA's comments were generally supportive of the proposed rule with some small exceptions.

The second PCB rule relating to "incidental generation" of PCB's in chemical processes scheduled to issue in May still has not issued as of June 1.

The rule had been held up by OMB and more recently by the EPA Administrator's top level staff.

The incidental generation rules may have major impact on the chemical industry.

CMA PCB Task Force

The CMA PCB Task Force was reconstituted. Eight companies (Monsanto, Dow, Olin, General Electric, DuPont, Stauffer, Ethyl and PPG) constitute the panel. Supplementary funds are being provided by CMA. (Total budget ~\$150,000.) Ed Warren of Kirkland and Ellis has been retained as outside counsel to represent the CMA PCB Task Force in the rule-making and any subsequent challenge if necessary.

Monsanto PCB Inventory Update

Very preliminary results of the Corporate PCB inventory indicate a slight increase in PCB's and PCB equipment stored for disposal as of December 31, 1981, over the preceding year despite concerted efforts last year to process as much material as possible at EPA approved facilities.

As of December 31, 1981, ~101,000 gallons of PCB liquids were stored for disposal vs. 92,000 the preceding year. In 1981, about 38,000 gallons of PCB liquids were incinerated at approved facilities, and lesser quantities of PCB contaminated oils (>50 <500 ppm PCB's) were disposed of at EPA approved facilities.

However, since January 1, 1982, W GK plant has made significant progress in disposing of PCB liquids in storage and expects to have substantially all of these old materials destroyed by third quarter. (W GK stored material accounts for about 70% of the total Corporate inventory.)

Inquiries/Responses

Inquiries and responses were again significantly higher in May. The increased workloads due to this consistently higher volume of calls will require some changes in our handling/logging practices.


J. H. Craddock