Monsanto

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

DATE April 13, 1981

SUBJECT PCB TRANSFORMERS - "INTERIM MEASURES PROGRAM"

REFERENCE

cc C. F. Callis - B3CA
J. R. Condray - G3WG
P. S. Park - E2NE
M. C. Throdahl - D1D

TO : See Distribution

On October 30, 1980, the U.S. Court of Appeals for the District of Columbia Circuit ruled in relative part that the Environmental Protection Agency (EPA) must reconsider its regulatory approach to polychlorinated biphenyls (PCB's). On February 12, 1981, the Court ordered that more information be gathered to support PCB regulations and gave the EPA 18 months to develop this information.

During this 18-month period, existing PCB regulations remain in effect and, in addition, owners and users of transformers must undertake certain inspection and maintenance procedures known as the "Interim Measures Program." Inspection requirements for the Interim Measures Program, as well as an overview of the Court order, were published in the Tuesday, March 10, 1981 FEDERAL REGISTER (46 FR 16090).

A copy of the notice is attached, which includes detailed definitions and procedures.

Briefly, under the Interim Measures Program the major requirements are:

1. Visually inspect all PCB transformers (PCB's 500 ppm or greater) at least once every three months.

2. 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, cleaning or replacement of the transformer must be commenced within two days of date of detection.

3. Records must be kept of the following:

   a. location of each transformer
   b. date and name of inspector
   c. all leaks observed (or system OK)
   d. description of all servicing

   Records must be maintained for three years.

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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

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