

Monsanto

FROM
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DATE : October 13, 1983

CC.

SUBJECT : Weekly Highlights - PCBs

REFERENCE :

TO : W. B. Papageorge

- EPA filed their quarterly report with the D.C. Circuit Court on progress in the new PCB rulemakings - scheduled to be published December 1. The agency re-affirmed to the Court that the consensus proposal for the new rule submitted by CMA and EDF "provides a satisfactory framework" for the new rule.
- EPA management in the Office of Toxic Substances indicated in a private contact that both OTS and the Enforcement Division would be interested in developing technically based PCB spill clean-up rule along the lines of the CMA/EDF consensus rule for incidental PCBs. Timing is such that the Agency would like to include it in the December 1 rule proposal package. Other members of the CMA PCB task force are interested in developing such a rule for clean-up as well as some EDF representatives. This project will be pursued in Washington next week.
- Confusion and disruption of our planned PCB disposal program at Monsanto plants due to EPA Enforcement Division's recent policy statement/interpretations effectively reducing storage time 90 days (270 days vs. 1 year) continued. Waste contractors are "jammed" with material. Contacts with Rollins Environmental Services management, our prime supplier of PCB disposal services, assures us that Monsanto commitments will be honored and given priority. PCB disposal problems at JFQ and MRC-Dayton were resolved.



J. H. Craddock

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