Monsanto

FROM
(P T—LOCATION—PHONE) J. H. Craddock - G4NH (4-4764)

DATE : February 1, 1983 CC.

SUBJECT : Monthly Report - January, 1983
PCB Surveillance

REFERENCE :

TO : W. B. Papageorge

HIGHLIGHTS

New Regulations - Incidental Generation Of PCB's During Manufacture

The ad hoc committee of industry, environmentalist and EPA representatives to develop reasonable PCB regulations has continued to meet and has reached a consensus on several key points.

Initial negotiations have seen environmentalist and industry groups more closely allied together and in agreement than either group with EPA.

Product Stewardship

Witco Chemical - Assistance was provided to Witco Chemical Company at the request of their senior management to aid in preparation of litigation defense for alleged site PCB contamination at their Perth Amboy, New Jersey plant.

PCB Inquiries - During January approximately 140 PCB inquiries/responses were handled.

Compliance - Monsanto Facilities

Soda Springs plant shipped the remaining current inventory of PCB materials stored for disposal to Rollins Environmental (Texas) for incineration.

Other - EPA announced that PCB compliance inspections were tripled in 1982 over 1980 at 2,089 inspections.

SUMMARY

1. Objective

Influence more reasonable regulation of PCB's by State and Federal agencies.

Status

New Regulations - Incidental Generation Of PCB's During Manufacture

The ad hoc committee of industry, environmentalist and EPA representatives to develop reasonable PCB regulations has continued to meet and has reached a consensus on several key points.

Initial negotiations have seen environmentalist and industry groups more closely allied together and in agreement than either group with EPA.

EPA management (John Todhunter) established a target date of March 1 for the ad hoc committee to recommend a "negotiated rule" to the agency. In the interim, the EPA continues on a parallel path to promulgate the new PCB rules using a totally different approach.

The ad hoc committee members include Chemical Manufacturers Association (CMA), Dry Color Manufacturers Association (DCMA), Environmental Defense Fund (EDF), National Resource Defense Council (NRDC) and EPA. Monsanto, Dow Chemical and General Electric Company are included in the CMA committee representatives.

2. Objective

Provide technical information and assistance to the general public, regulators, former customers and environmentalists to assure rational handling of PCB issues.

Status

Product Stewardship

Witco Chemical - Assistance was provided to Witco Chemical Company at the request of their senior management to aid in preparation of litigation defense for alleged site PCB contamination at their Perth Amboy, New Jersey plant.

JHC met with Witco senior managers and legal counsel to discuss technical details, particularly analytical chemistry, possible strategies and similar known precedents.

The legal action against Witco was brought by the State of New Jersey, Department of Environmental Protection.

The state is seeking clean-up and removal of contaminated on-site soil followed by capping and stabilization. In addition, the State alleges off-site contamination of several miles of sewers and is seeking similar damages although the source of off-site contamination has not been established.

PCB Inquiries - During January approximately 140 PCB inquiries/responses were handled.

3. Objective

Provide guidance to Monsanto facilities for cost effective compliance with regulations.

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Status

Compliance - Monsanto Facilities

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Other - EPA announced that PCB compliance inspections were tripled in 1982 over 1980 at 2,089 inspections.

JHC

J. H. Craddock

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