

FROM
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DATE : October 3, 1983

SUBJECT : Monthly Report - September 1983
PCB Surveillance

REFERENCE :

TO : W. B. Papageorge

CC.

HIGHLIGHTS

Enforcement Activities

- EPA Enforcement Division published several PCB policy statements and their interpretation for enforcement actions. The agency's stated intent is to interpret these policies in the strictest sense.
- EPA published an updated list of PCB approved Class I landfills along with company and agency regional contacts.
- The new "Superfund List" of national priority hazardous waste sites includes a 40 mile stretch of the Hudson River in New York State. This portion of the river was contaminated with PCBs discharged by General Electric Company from their capacitor manufacturing facilities prior to 1970. EPA Administrator Ruckelshouse reversed the decision made last year by his predecessor and signed a consent decree to make available \$20M from the Clean Water Act funds to be available for dredging the river.
- The Carondelet Plant had a PCB enforcement/compliance inspection. The EPA inspector had no serious concerns or complaints about this facility.

Health And Toxicity Data

- Contract details were finalized on a research proposal to study effects of PCBs fed at various levels to dairy cattle at Ohio State University.
- Several major symposia were held nationally and internationally to review, again, PCB health effects. These included a conference held by the U.S. National Institute of Environmental Health Sciences (NIEHS) at Raleigh/Durham, North Carolina; an international workshop on occupational hazards caused by PCBs and chlorobenzenes in capacitors and transformers held by the Institute of Occupational Health of Finland at Helsinki; and an international symposium held for the EEC (European Economic Community) nations by the Organization of Economic Cooperation and Development (OECD) at the Hague in the Netherlands. JHC participated in the NIEHS and OECD symposia.

SUMMARY1. Objective

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

StatusEnforcement Activities

- EPA Enforcement Division published several PCB policy statements and their interpretation for enforcement actions. The agency intends to interpret these policies in the strictest sense. No court challenge has been filed because of these policies - yet - but probably in the offing.
- EPA published a new list of PCB approved Class I landfills along with company and agency regional contacts this week. This will be provided to operating unit environmental control managers for distribution to appropriate responsible staff in their units shortly.
- The new "Superfund List" of national priority hazardous waste sites includes a 40 mile stretch of the Hudson River in New York State. This portion of the river was contaminated with PCBs discharged by General Electric Company from their capacitor manufacturing facilities prior to 1970. EPA Administrator Ruckelshouse reversed the decision made last year by his predecessor and signed a consent decree to make available \$20M from the Clean Water Act funds to be available for dredging the river. Details of the dredging project have not yet been worked out nor the total package approved.
- The Carondelet Plant had a PCB enforcement/compliance inspection. The EPA inspector had no serious concerns or complaints about this facility.
- The EPA PCB enforcement program is expected to emphasize heat transfer and hydraulic systems during the next two months as part of an evaluation of whether or not to extend the current contaminated equipment use authorizations which expire July 1984. (These systems primarily used old Therminol FR and Pydraul fluids.) Many such systems are still located at several Monsanto facility sites.

2. Objective

Provide initiatives to reduce public hysteria and develop more reasonable understanding of PCB health and environmental effects.

StatusHealth And Toxicity Data

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- Several major symposia were held nationally and internationally to review, again, PCB health effects. These included a conference held by the U.S. National Institute of Environmental Health Sciences (NIEHS) at Raleigh/Durham, North Carolina; an international workshop on occupational hazards caused by PCBs and chlorobenzenes in capacitors and transformers held by the Institute of Occupational Health of Finland at Helsinki; and an international symposium held for the EEC (European Economic Community) nations by the Organization of Economic Cooperation and Development (OECD) at the Hague in the Netherlands. JHC participated in the NIEHS and OECD symposia.
- At the recently completed National Institute of Environmental Health Sciences (NIEHS) three-day conference on Potential Health Effects of PCBs and Related Persistent Halogenated Hydrocarbons, thirty-one technical papers were presented by thirty-three leading world scientists. Many papers classified PCBs as being similar to and causing the same adverse animal health effects as PCBs, TCDDs and PCDFs. In several cases authors implied similar human effects.

However, a major "finding" of the conference was that a causal-effect relationship between PCBs and chronic human health problems (except chloracne) has not been established (yet).

A significant number of new PCB and "related" chemical health effects studies were described indicating a resurgence of research into this area. NIEHS staff indicated funding is available for proposals.

- The Helsinki conference focused on problems arising from toxic combustion products from askarel-filled electrical equipment in fire situations. The participants made no distinction between combustion products and type of die electric fluid, e.g., PCB, trichlorobenzenes and other mixtures. In one breath the speakers all tend to speak of PCB, askarel, dioxin, trichlorobenzene, and other similar compounds as being both technically and toxicologically equivalent.
- The OECD conference only reviewed older data and discussed it in relation to current European manufacture, sale and usage. Up to 1983, European countries still produced and used some 30 million pounds of PCBs annually.

Scandinavian countries, Germany and the Netherlands have very vocal environmental groups pushing for a total ban law in EEC nations. Private discussions indicated they feel they will achieve such a ban law within three years.

3. Objective

Provide assistance and resources against PCB litigation.

Status

- A significant increase in PCB litigation has occurred in Northern California fueled by the recent San Francisco transformer fire incident. Cases range from worker exposure, electrical utility pole incidents, to jail prisoner exposure to leaking transformers. We are monitoring developments in California, particularly recent news media accounts.



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