Monsanto

JUL 24 1978

FROM (NAME—LOCATION—PHONE) J. C. Weber - B2SK

DATE : July 24, 1978

SUBJECT : PCB Regulation
June 7th Proposal

REFERENCE :

TO : P. H. Smith
J. C. Masson

cc: F. G. Wohlschlaeger
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The following are our comments concerning 40 CFR 761.31 (f) - authorization for hydraulic die casting systems.

The proposed regulation - 40 CFR 761.31 (f) authorizes a PCB activity in the hydraulic die casting systems. However, nowhere in the regulation does it authorize a PCB activity for other industrial hydraulic systems. These other industrial hydraulic systems are in the following industries and equipment:

PRIMARY METALS
(Steel, Aluminum, Copper)
- Continuous Casters
- Rolling Mills
- Furnace Controls
- Stripper Cranes
- Automatic Welders
- Charging Equipment
- Mobile Equipment
- Hydraulic Shears

FORGING AND EXTRUSION
- Forging Presses
- Extrusion Presses
- Mobile Equipment

COAL MINING
- Continuous Miners
- Shuttle Cars
- Conveyors
- Car Spotters

CHEMICAL-PETROLEUM-POWER
- Valve Operators and Controls For High Temperature Equipment
- Air Compressors
- Steam and Gas Turbines

FOUNDRIES
- Core Machines
- Molding Machines
- Furnace Controls

FABRICATION
- Forming Presses
- Automatic Weiders
- Furance Controls
- Conveyors

INJECTION MOLDING
- Molding Machines

We recommend that 40 CFR 761.31 (f) be changed from hydraulic die casting systems to industrial hydraulic systems which will authorize PCB activity for all industrial hydraulic systems.

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