

MONSANTO

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Date : March 29, 1988

cc: D. R. Bishop - G4WA
T. M. Bistline/D. Snively-E2NP

Subject : PCB Issues - March Highlights

G. F. Fort - G4WD
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Reference :

R. L. Harness - C2SB

TO : W. J. McCarville
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I. Regulatory Issues

- A detailed health effects rebuttal to the Ontario, Canada Workers' Compensation Board (WCB) report alleging 3 types of human cancer from occupational PCB exposure was completed and submitted prior to the March 9 deadline. The rebuttal was filed on behalf of CMA and the Edison Electric Institute. Monsanto staff took a lead role in preparation of the documents along with consultants from the University of Arkansas (Drs. Harbison and James).

Subsequently due to the unprecedented response, the WCB extended the deadline 60 days to allow for additional comments.

- The original Synar PCB Disposal Statute HR 3070 has been amended (the Luken Amendment HR 3070) and undergone subcommittee markup. Congressman Florio (NJ) has declared "war" on the present bill because it does not go "far enough" and has threatened an all out battle at full committee markup tentatively scheduled right after Easter recess.

Florio wants to put PCB disposal into RCRA and/or add state preemption and enforcement provisions, financial responsibility and corrective action measures to the present HR 3070.

The industry coalition (CMA, NEMA, EEI) with the addition of the Hazardous Waste Treatment Council, Am. Assn. Railroads and others are actively involved. Individual company government relations staff including Tom Helscher are providing assistance.

II. Plants

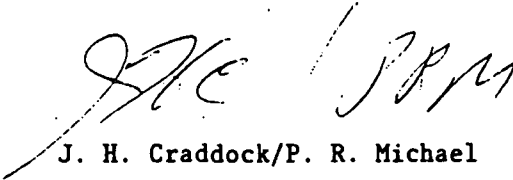
- The corporate PCB inventory for calendar year 1987 is nearing completion. Preliminary results indicate that most plants are making progress in removing PCB equipment. The final corporate totals, expected within the next 1-2 weeks, will not reflect all the disposal activity because of the "discovery" of 127 capacitors at the Decatur plant that were not included in previous inventories.

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- Due to problems with a local contractor, some soils and building materials removed from the St. Charles fire test site have still not been properly disposed. Efforts are continuing by MAP/MCC staff to insure that all of the material is landfilled at an adequate site and not used for fill purposes.

III. Miscellaneous

- New York Academy of Sciences - It appears the NYAS is trying to bring development work on "Managing PCBs in the Hudson-Raritan Estuary and New York Bight" to an end as quickly as possible. It is likely that no substantive changes will be made in the report prior to issue. We are sending a letter to NYAS documenting our position of 1) dissatisfaction with the current document and 2) willingness to participate in further development work should it occur. CMA, GE, and EDF have adopted similar positions.


J. H. Craddock/P. R. Michael