MONSANTO

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Date : May 31, 1988

Subject : PCB Issues - May Highlights

Reference :

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I. Regulatory Issues

- The Synar PCB Disposal Bill HR 3070, as amended by Congressman Luken was approved by the House Energy and Commerce Committee. Attempts by Congressman Florio to further amend the Bill to add more stringent requirements for state preemption and state enforcement provisions, were defeated.

  The Bill had strong support from a broad consensus group including environmentalists, industry, EPA and ranking Committee members of both parties.

- California Proposition 65 type legislation surfaced in two other states, Illinois and New York. The legislation in New York also requires lists of chemicals known to cause cancer or reproductive toxicity. Monsanto and the CMA PCB Panel plan to monitor activity in these states in an attempt to influence PCB notification similar to that obtained in California.

- A revised PCB enforcement strategy was issued by EPA's Office of Compliance Monitoring. More effort will be focused on disposal facilities, "brokers and storage or intermediate handling" facilities, and facilities generating inadvertent PCBs." The regions also were told to devote 5-10% of their PCB inspections to follow-up at spill cleanup sites; 15-25% for commercial buildings to determine compliance with the PCBs-in-fires rules, and 30-45% to general PCB inspections..."

- Comments were made concerning the coverage of PCBs in the draft of EPA's new National Primary Drinking Water Regulations. The proposed maximum contaminant level (MCL) of 0.0005 mg/L and the maximum contaminant level goal (MCLG) of zero are consistent with past EPA documents. The MCL corresponds to a lifetime cancer risk of $1x10^{-4}$ using EPA's cancer potency for PCBs. However, EPA lists the "achievable level," based on best available technology (granular activated Carbon), as 0.0007

mg/L. Also, the practical quantitation limit for the analytical method specified for PCBs is 0.004-0.009 mg/L. Therefore, EPA is proposing an MCL for PCBs, an enforceable standard, that cannot be achieved or measured. More extensive comments will be filed when the draft officially appears in the Federal Register for public comment.

II. Plants

- Additional samples taken from the St. Charles fire test site show the possibility of a few areas contaminated with PCBs at levels up to 200-300 ppm. There is significant uncertainty in the analytical data because results from two independent laboratories differed by factors of 5-10 on split samples. A decision on appropriate cleanup actions will be delayed until the area and degree of contamination are adequately defined.

- A possible PCB spill occurred at the Indian Orchard plant when a buried drum of unidentified liquid was punctured during excavation for a new sewer line. A quick on-site analysis indicated the presence of chlorinated hydrocarbons. Appropriate state and federal authorities were notified. Cleanup is on hold until the liquid is fully characterized.

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