

Monsanto

FROM: J. H. Craddock - B3NA (4-4764)

DATE: June 25, 1984

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SUBJECT: Monthly Report - June 1984
PCB Surveillance

REFERENCE

TO: W. B. Papageorge

HIGHLIGHTS

• New "Incidental" Generation PCB Rule

EPA announced that they are on schedule to propose the new "incidental generation" PCB rule about July 1. The new rule is expected to follow closely the "consensus" rule proposed by the chemical industry (CMA) and environmentalist (EDF/NRDC) coalition.

• EPA - Spill Clean-Up Policy Draft

EPA issued a draft policy statement for PCB spill clean-up which would require clean-up to background or zero ppm. The CMA PCB Task Force as well as Monsanto are concerned about the overly stringent requirements of this policy statement and in effect lowering the 50 ppm disposal cut-off to zero in case of spills. Implications for clean-up under other EPA rules such as Superfund are apparent.

• Findett Site Discussion With Region VII EPA Superfund Staff

Monsanto representatives met with EPA Superfund staff in Kansas City to discuss the Findett site and EPA's interest in sampling on adjacent farm property.

• Management Review

The PCB issues program was reviewed with senior management, including Messrs. Corbett, DeSchutter and Potter. Proposals were discussed for increased funding and manpower to handle increasing activity, especially in litigation and regulatory/compliance areas.

• Corporate PCB Inventory

The Corporate PCB inventory was completed. Results indicate the program has reached the gradual decline stage since most of our removal from service and disposal (other than incidental generation) occurs as use of authorized PCB electrical equipment ceases due to malfunction and/or re-modeling of manufacturing facilities.

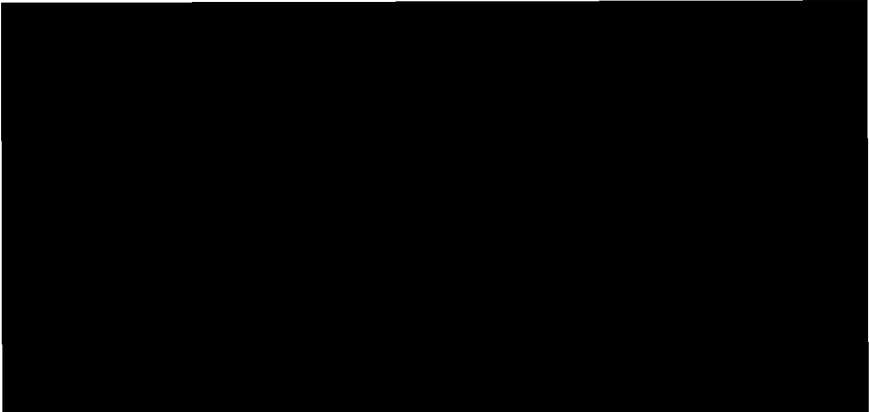
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As of December 31, 1983, Monsanto U.S. sites had in service 458 PCB transformers and 1,976 large PCB capacitors.

- PCB Transformer Risk Study

Risk assessment consultants from Pickard, Lowe & Garrick, fire and nuclear reactor risk assessment experts, reviewed their study comparing fire safety of askarel (50% PCB/50% trichlorobenzene) and mineral oil filled transformers.



- PCB Transformer Risk Study

Risk assessment consultants from Pickard, Lowe & Garrick, fire and nuclear reactor risk assessment experts, reviewed their study comparing fire safety of askarel (50% PCB/50% trichlorobenzene) and mineral oil filled transformers. The study was initiated for possible use in defense in transformer fire litigation, e.g., Binghamton, New York office building, etc.

The results show a significant decrease in fire risk for askarel vs. mineral oil.

Summary data of this quantitative result has also been communicated to EPA for consideration in the new PCB transformer rule.

- 2. Objective

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

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Status

- Findett Site Discussion With Region VII EPA Superfund Staff

Brent Gilhousen and John Craddock met with EPA Superfund staff in Kansas City to discuss the Findett site and EPA's interest in sampling on adjacent farm property.

The meeting was cordial and we indicated Monsanto's willingness to cooperate, however, confidentiality procedures and legal requirements must be carefully preserved and met.

- Corporate PCB Inventory

Tabulation of the recent Corporate PCB inventory (through December 31, 1983) is now essentially complete. Results indicate the program has reached the gradual decline stage since most of our removal from service and disposal (other than incidental generation) occurs as use of authorized PCB electrical equipment ceases.

Due to continuing phase-out of obsolete or leaky equipment and incidental generation, this program will be active for several years until all PCBs/equipment is disposed of. In addition, each site's annual summary will be required by TSCA as part of the required "annual document" as long as any PCBs/equipment is present.

The following table summarizes this year's inventory results compared with previous years.

PCB Items	Date (As Of Dec. 31)			
	1983	1982	1981	1980
I. Materials Stored For Disposal				
Fluids (Gal.)	13,800	4,800	103,000	109,000
Capacitors	25	378	43	65
Transformers	1	6	22	31
II. Materials In-Service*				
Fluids	----- (Only In Equipment) -----			
Capacitors	1,967	2,015	1,426**	--
Transformers	458	490	601	--

*Must ultimately undergo disposal.

**Discrepancy in quantities due to better review/evaluation of equipment.

Summary data was provided to the DEO's. Details of the inventory for each operating unit will be provided to the appropriate environmental control manager for the unit.

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3. Objective

Influence more reasonable regulation of PCBs by State and Federal agencies.

Status

- EPA - Spill Clean-Up Policy Draft

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The policy - No. 9 - for PCBs to date is tantamount to rulemaking without benefit of rulemaking procedures.

The CMA PCB Task Force will informally put EPA Staff on notice that we may challenge both the policy and policy making procedure in court if they continue on this path.

Environmental groups (EDF and NRDC) who participated in the "consensus rulemaking" for incidental PCBs have indicated they would discuss joining CMA in objections to the policy and procedure and possibly discuss a "consensus position" for spill/clean-up.

- EPA - "Incidental Generation" Rule

EPA announced that the new "incidental generation" rule is on schedule and is expected to be signed by Administrator Ruckelshaus and published in the Federal Register about July 1.

The new rule actually comprises five (5) different PCB rules and is expected to closely follow the "consensus rule" proposed by chemical industry and environmentalists (CMA/EDF/NRDC).

Monsanto had considerable input into drafting the consensus rule. Other than recordkeeping and analytical sampling, the rule is expected to have minimal impact on Monsanto's existing products.


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