P. W. Gann - St. Louis

New file

July 20, 1972

W. B. Papageorge - B2NK
D. E. Roush

FDA PROPOSALS ON PCB'S

Cumming Paton

I have just read Mr. Papageorge's July 14, 1972 letter to Mr. Clerk of HEW which you circulated. The following comments may not be new, but do reflect subjects resulting from Therminol FR conversions and PCB disposal. These are presented here only to assure our awareness.

1. I trust someone knows the definition of "Food Industry". We, on the conversion team, have contacted many customers who were on certain Monsanto "Food-related" lists (i.e. the March 6, 1972 survey letter). But we also have contacted companies who appear involved to a similar extent (i.e. curtain coaters) which were not on the "list" -- and every so often other companies or sites come to light.

   I trust no one believes we have contacted all users in the "Food Industry".

2. Is there a level of biodegradability of PCB's acceptable to HEW?

3. Is HEW addressing the problem of PCB disposal?

   Liquids
   PCB Sludge
   Solids Containing PCB

   Our guidance to customers is limited:

   a) We offer an incineration service for non-aqueous PCB fluids.

   b) Water containing PCB is customer's responsibility to dispose.

   c) Sludge and solids containing PCB's is also the customer's responsibility to dispose.

d) Our reply to customer's questions on "b" and "c" is, "you may want to contact your local authorities for an approved landfill." This reply includes questions from heat transfer, plasticizers, industrial fluids and dielectric users.

P. W. Gann

/clg