Monsanto

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

DATE : July 24, 1978

SUBJECT : PCB Regulation
June 7th Proposal

REFERENCE :

cc. F. G. Wohlschlaeger
E. T. Mollica
A. A. Johnson
W. C. Hammann

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

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.

J. C. Weber

cmf

0550781

IN - 10 (REV. 11/77)

PCB-ARCH0745174