Monsanto

FROM (NAME & LOCATION) Paul B. Hodges - ElSF General Offices

DATE : June 1, 1972

SUBJECT : EPA POLICY ON PCB's

REFERENCE : PBH, 4/28/72 "PCB's - Allowable Discharge From Producing/Using Plants"

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In conjunction with the report "Polychlorinated Biphenyls and the Environment" recently released by the federal "Task Force on PCB's", EPA has sent guidelines to the regional offices stating policy on discharges of PCB's from manufacturers/users. Bill Papageorge obtained a copy of these guidelines and they are attached for your use. Please use them with discretion as they are not documents for the general public.

In general, these guidelines fit our expectations from the conference in Washington 4/13/72 (see reference - minutes of that conference). Critical points:

(1) Water quality limit of 0.01 ppb - not to be monitored directly, but to be based on fish studies - if water is less than 0.01 ppb, fish will not exceed 5 ppm.

(2) Allowable discharges - policy is stepwise reduction to no "knowing" discharge. From a more practical standpoint, discharges will be limited to that amount which will not result in more than 0.01 ppb in the stream at mean annual flow, assuming complete mixing. Effects of background levels relative to this discharge limit are not discussed, so we don't know whether or not we can discharge the full allowance for the Mississippi River (9.7#/day @ 180,000 cu ft/sec). In the 4/13/72 Washington meeting, EPA had indicated that about 2-4#/day appeared reasonable from us.

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(3) Effects of previous discharges of PCB's to the environment are recognized along with acknowledgment that considerable time will be involved in the diminution of these effects.

Strategy for dealing with federal authorities in the near future (and probably Illinois authorities later) needs to be developed. We suggest that the WGK Plant arrange for a meeting at which this strategy can be discussed.

Paul

Paul B. Hodges

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Att.

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