W. B. Papageorge - General Offices, B2NA

May 23, 1973

J. K. Grant - 1740
A. E. Leisy - 1740
J. R. Savage - B2SL

SCRAP AROCLOR RETURNS

Memo, JKG to AEL, 5/11/73

Dr. C. Paton
B2SC

In response to your request that I comment on the problem of leaking scrap Aroclor drums, I have the following to offer:

I don't believe that we will ever achieve a situation in which we can guarantee that no drums of returned material will ever leak. The best we can hope for is that we keep the incidences at a very low level.

It is my understanding that the responsibility for the material remains with the shipper and any costs or claims resulting from an incident must be borne by him. The proposed ANSI guidelines for handling askarels refer to the use of "appropriate metal transport drums". Bill Maddox's letter to customers relating to our incinerator service contains the following paragraph:

> "To prevent leakage, please use return drums which meet DOT 17E specifications (55 gallon drums, 18 gauge, 2 bung head; 5 gallon drums, 24 gauge minimum). The outside of the drums must be clean, free of fluid and not leaking. Cleanup or other costs affecting the carrier which are related to fluids leaking from drums will be charged to the shipper."

Polychlorinated biphenyls are not classified as hazardous materials, therefore, there is no restriction against shipping in mixed loads with food, pharmaceuticals, animal feeds or wearing apparel.

It appears to me that the only action we can take is to continually remind our customers of the requirements described in Bill Maddox's paragraph quoted above.

W. B. Papageorge

/bt

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