MONSANTO

From
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Date : May 4, 1989 cc: P. R. Michael - A2NE

Subject :

Reference :

TO : J. P. Hyland - G4WT
L. P. Paradis - G4WS
M. R. Foresman - G4WT
P. H. Smith - E2NK

Attached for your information is the recent New Jersey proposal to list PCBs as a RCRA Hazardous Waste for the state.

Although most provisions follow Federal TSCA PCB regulations, a quick reading reveals a couple of "sleepers" that could cause problems, e.g., small capacitor exclusions, possible requirement of state PCB storage facility permits, requirement for an executive of the corporation to certify compliance of storage facility, etc.

Comments are due in June. Let me know soon if we need to discuss and file any comments.

J. H. Craddock

Attachment

PCB-ARCH-EXT0379713