Monsanto

FROM (NAME—LOCATION—PHONE) J. H. Craddock - G3WD - 4-4764

DATE October 2, 1985

SUBJECT NEW PCB TRANSFORMER RULE

REFERENCE

TO :Sam Cheng - Fisher - 1580
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This memo is a reminder of the December 1, 1985 deadline for registration of all PCB Transformers with local fire departments. EPA defines these as ---- "fire response personnel with primary jurisdiction (that is, the fire department or fire brigade which would normally be called upon for the initial response to a fire involving the equipment.)"

Specific information to be provided is listed in the rule [40 CFR §761.30(a)1(VI)]. If the in-plant fire brigade is the primary response unit appropriate notice should be given and documented. If local outside fire departments provide primary response they must be notified with appropriate documentation.

In addition, specific requirements for certain safety equipment, storage of combustibles, etc., must be met depending upon whether or not buildings are defined as a "commercial building" or an "industrial building".

Many of our buildings clearly fall into one category or the other as defined by the regulations (40 CFR §761.3). However, some plant sites (industrial sites) have office buildings which are defined by the regulations, or interpreted, by EPA, as "commercial buildings". By definition, an "industrial building" means a building directly used in manufacturing or technically productive enterprises, not generally or typically accessible to other than workers.

CMA has challenged the EPA definitions and interpretations and asked for clarifications. EPA's response is attached. In general, EPA has stated that even on an industrial site which includes separate buildings dedicated to different functions, i.e., such as office facilities and research laboratories, etc. (within the boundaries of an industrial site) that non-manufacturing buildings will be defined as "commercial buildings" for this rulemaking.

IN . 10 · REV 8 77)

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EPA has indicated an increased compliance/enforcement inspection schedule which will specifically include these new transformer requirements. Plant environmental and utility staff must be aware of, and familiar with, these new rules to ensure compliance.

Bob Kaley (4-8558), Pete Smith (4-8506) or I will be happy to discuss particular issues with you.

John H. Craddock

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Enc.
Note: Enclosed are copies of (1) the new transformer rules and definition and (2) EPA's interpretations of the definitions of "commercial" and "industrial buildings".

JHC

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