EPA has announced they will beef-up enforcement in the PCB storage/disposal and records keeping area. Recent trade press have published an increased number of companies cited and fined for PCB violations.

Monsanto last week had an EPA - PCB inspection at Soda Springs and is expecting one momentarily at Carondelet.

Inspections focus on three major areas:

I. Records/Storage/Marking

II. Equipment In Use

- Inspection Records/Marking
- Maintenance
- Visible Signs Of Leaks/Housekeeping

III. Disposal

- Documentation

Since June 1980 I've tried to provide information for compliance with PCB rules using a standardized recordkeeping system and periodic updates of EPA activities. There is no standard format prescribed by EPA for meeting the TSCA requirements - this complicates the task. Also regulations continue to change.

Due to numerous changes in personnel, I want to review key regulations, Monsanto practices and EPA enforcement activities with you and urge that you do the same with plants in your sphere of responsibility.

In several instances considerable effort has been required to insure that the records were in fact all available - back to 1979 and arranged in an orderly fashion so they could be presented to EPA inspector upon demand, explained and actually audited.

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A good guideline for this is a copy of the EPA inspector's manual which was made available to Monsanto managers and plant staff in 1981.

Current Monsanto records forms are updates of original forms issued by CED under sponsorship of the ECC in mid-late 1978.

- Form F
- Form G
- Form D

For summary inventory of in-service equipment, materials in storage for disposal, and actual disposal records.

Other records needed are detailed inventory of equipment/ material in service and records of required equipment and storage facility inspections.

The Annual Document is not a report to be submitted to EPA. It is an on-site record that must be kept on site and produced upon demand of EPA. The Annual Document inventories all PCB material on site from July 2, 1979 and traces its continued use, storage and ultimate disposal. It establishes an audit trail.

This document must be updated with a new summary by July 1 of each year for the preceding year. In effect new summaries of certain prescribed items are prepared each year and added to the document - the "document" grows thicker - nothing in the paper trail is discarded. Records must be kept for five years after all PCB activity on site ceases. Prudence dictates we keep them in perpetuity to be able to defend ourselves.

Certain back-up records - sometimes called a correspondence file - must be kept. Burden of proof is on the plant!

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These records include:

- Analyses, results, certificates of analysis
- Contractor's invoices
- Waste disposal manifests, purchase orders, etc., shipping documents
- Any contengencies and action plans
- Any document explaining decisions and actions taken, e.g., classification of transformer, decontamination of equipment, spill plans, clean-up plans, MSDS, etc.
- PCB Workplace Exposure Guide

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A. Discuss Annual Document

1. Summary of equipment in use - Form G
2. Summary of material(s) in storage - Form F
3. Detailed listing (inventory) of material stored for disposal and its disposition - Form D
4. Monthly inspection of storage facility
5. Quarterly inspection of totally enclosed electrical equipment in use (weekly for equipment posing a risk to food and feed)
6. Correspondence file

B. Equipment In Use

1. Inventory of PCB equipment in use
2. Inspection records (quarterly or weekly for electrical totally enclosed - other)
3. Visual inspections of items and marking
4. Housekeeping!

C. Disposal

1. Documentation of actual disposal (manifests, bills of lading, receipts from contractor, purchase orders)

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