Monsanto

FROM (NAME—LOCATION—PHONE) J. H. Craddock - B3NA (4-4764)

DATE : December 20, 1983

cc: G. L. Lindsay - B3SA
W. B. Papageorge - B3NA

SUBJECT : New PCB Regulations - Heat Transfer & Hydraulic Systems

REFERENCE :

TO : A. A. Johnson - B3SG
K. S. Rosenberg - B3SG

EPA proposed a new series of PCB rules December 8 scheduled to become final June 1984. Included in the package is a "new" re-authorization for use of PCB contaminated Hydraulic and Heat Transfer Systems.

The rule simply states in two short paragraphs:

- Use In Heat Transfer Systems - After July 1, 1984, intentionally manufactured PCBs may be used in heat transfer systems in a manner other than a totally enclosed manner at a concentration level of less than 50 ppm.

- A similar paragraph replaces the phrase "heat transfer systems" with "hydraulic systems."

The agency produced almost 100 pages of support documents justifying allowing the continued use of this equipment essentially for the remainder of its useful life.

Of significance to the heat transfer business are other portions of the rule concerning "inadvertently manufactured PCBs." In calculating a 50 ppm (or other) cutoff level specified in the rules, inadvertent PCBs are discounted by factors of 50 for monochloro biphenyl and 5 for dichloro biphenyl. Thus depending upon final interpretation of these rules one could argue that monochloro biphenyl contaminated heat transfer systems if authorized could contain levels as high as (50x50) 2500 ppm PCBs (as monochloro biphenyl).

In the agency support document for heat transfer systems the agency has language saying that up to 100 ppm of intentionally manufactured PCBs could be justified in the new rule, however, no one has filed comments suggesting or requesting higher than 50 ppm levels.

If a business advantage such as advertising, customer relations, etc., could be derived from advocating a higher level in heat transfer systems, we can include affirmative comments supporting a request for the 100 ppm level. Several trade associations and other companies may make such a request on general principles and I recommend we do likewise unless you have business reasons to stand mute.

IN - 10 (REV. 8/77)

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Details of the proceedings are available. I will be happy to discuss this at your convenience. Comments to the EPA are due February 6, 1984. Hearings will be held in Washington February 21 and 22 if requested. I need your response by January 15.

J. H. Craddock

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