MONSANTO

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Date: November 30, 1990

Subject: PCB Issues - November Highlights

Reference:

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FILE

I. Regulatory Issues

- RCRA - The CMA PCB Panel led the Industry Consensus Group to file joint comments pertinent to PCB cleanup levels in the proposed RCRA Corrective Action Rule. The Panel amplified CMA's generic comment and propose that RCRA accept the TSCA-EPA Spill Clean-up Policy standards.

- State of Mass. - Final technical comments related to the proposed Mass. DNR PCB spill cleanup level were submitted by the CMA PCB Panel. The CMA technical comments supported the acceptance of EPA spill clean-up policy levels as meeting Mass. goals for being protective of human health and the environment. If the state budgetary crisis allows, Monsanto/CMA PCB Panel representatives will present arguments at the final technical hearing on the proposed cleanup levels in Boston in December.

II. Plants

- Informal visits were made to Fayetteville and Decatur to review and discuss PCB records and other PCB issues. Both plants still have PCB transformers (15 at Fayetteville and 64 at Decatur) and are among the few Monsanto plants which still have PCB containing electrical equipment. The Plant's PCB records appear to be in good order and the environmental staff have a good working knowledge of the PCB regulations and requirements.

  Each plant is aiming for the internal Monsanto Goal of all plants being PCB-free in 1992. Fayetteville should end the year with seven PCB transformers and will dispose of one of these and retrofill the other six in 1991. Decatur has seventeen units in the retrofill process and an AR in the approval process to replace 20 pole lighting transformers. They will dispose of two units by the end of 1990 but will have to retrofill or replace 25 units in 1991 to meet the 1992 goal.

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Luling has received analyses on the final three retrofilled transformers documenting that they are PCB free. The PCB regulations require that samples be taken 90 days after completion of the retrofill process. The Luling Plant is now "PCB free".

- Dayton received the final analyses on four retrofilled transformers and is now "PCB free".

III. Miscellaneous

- Alert observation by the World Headquarters environmental staff (Rich Edwards and Terry McMillan) assured proper disposal of a PCB transformer that "appeared" at a local used equipment broker as part of Monsanto Equipment. Because of age and markings, it was moved to a Monsanto secured area while analysis confirmed that it was indeed a PCB transformer. Procedures will be strengthened to prevent the transfer of transformers as used equipment without site environmental approval.

  A visit was made to the MAC's farm site in St. Charles and the Findett site to familiarize Gary W. Mappes with the local geography and the St. Charles water wells. A four-by-eight foot sign was observed on Wayne Tulock's property complaining of Monsanto's unfairness to him. This was the same sign he used to unsuccessfully picket the Creve Coeur site.

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