EIA

SPILL NOTIFICATION AND CONTROL PLAN

POLYCHLORINATED BIPHENYLS (PCBs)

Introduction

Studies have shown that polychlorinated biphenyls may persist in the environment and may be injurious to some forms of bird, aquatic and animal life. It is, therefore, extremely important that entry of these materials into the environment be minimized in the event of spillage while in transit by rail tank car or tank truck.

Purpose

This plan is intended to establish effective notification and action procedures, to guide the manufacturer of polychlorinated biphenyls (Monsanto) and capacitor manufacturers in the event of a spill while the material is in transit. A manufacturer using its own equipment and personnel to transport PCBs should instruct its employees concerning proper procedures to be followed in the event of a spill. Such instruction should be documented in each manufacturer's spill control plan.

I. SPILL NOTIFICATION PROCEDURE

A. Each tank car used to transport PCBs from Monsanto to the manufacturer should be marked boldly on its sides and ends, in 4" to 6" high letters, with the instruction, "In Case of Spill Immediately Call 618/271-5835, collect".

B. Each capacitor manufacturer should provide to Monsanto the number of a telephone which is manned 24 hours per day 7 days per week, which Monsanto should call to inform the manufacturer of a spill. Where it is not possible to maintain such a number, the capacitor manufacturer should provide the

names and telephone numbers of at least three individuals and Monsanto should call those persons, in succession if necessary, to provide notification of the spill.

C. When Monsanto receives notification of a spill, its employee shall obtain the following information:

1) The name of the caller.

2) The official title and function of the caller.

3) All available information concerning the spill, including:

a) Exact location (in sufficient detail to find the site on maps and on the ground).

b) Time of occurrence (as close as possible).

c) Name of transportation company involved and its emergency call number.

d) Amount of material spilled and its current location.

e) Cause of spill, if known.

f) Condition of the transportation equipment.

g) Disposition of casualties, if any (what hospital, clinic or physician).

h) Witnesses (name and address).

i) Information as to how to contact the caller or other responsible party at or near the scene.

j) Identity of others who have been notified, including local, state and federal pollution control agencies. Specifically name and phone number of persons contacted.

D. After obtaining the information outlined in C., Monsanto, acting as agent for the capacitor manufacturer, should provide the following information to the person reporting the spill:

1) Material is fire resistant.

2) It is recommended that rubber boots and gloves of Neoprene or PVC be worn when handling the material, to avoid possible skin irritation.

3) Possible control procedures enumerated in Section II below.

E. Monsanto should then immediately notify the capacitor manufacturer that a spill of its material has occurred and should provide the manufacturer with the information it has obtained concerning the spill.

F. The capacitor manufacturer, upon notification of a spill, should immediately notify appropriate state and federal pollution control agencies and should dispatch a responsible individual to the spill site immediately.

1) To notify the federal pollution agency, call 1-800-424-8802.

2) To notify state pollution agency, if number is not known, call regional EPA office to obtain state number. (See attached map and phone list.)

II. SPILL CONTROL, CLEAN-UP AND PRECAUTIONARY PROCEDURES

The specific circumstances of a spill should dictate effective control and clean-up procedures. The following actions should be considered.

A. Possible control procedures:

1) Limit the amount of material that escapes from the container by righting the container (tank car or drum), closing valves, plugging holes with wooden pegs or by any other available means.

2) Limit spread of material by using absorbent materials such as dry sand, sawdust, oil absorbers or rags or by erecting an earthen dam, using any equipment available.

3) Prevent material from flowing into sanitary or storm sewers, ponds, lakes or rivers by whatever means available. Do not wash material away or into sanitary or storm sewers, ponds, lakes or rivers.

4) If other freight is contaminated, quarantine it until appropriate mode of disposition is determined. Such freight must be decontaminated or disposed of in a responsible manner.

B. Possible clean-up and precautionary procedures:

1) Pump free oil within contained area into drums or tank truck.

2) Dig up contaminated earth and transport to an area approved for the disposal of PCBs.

3) Decontaminate any equipment used in the clean-up operation and dispose of absorbent materials in a manner which prevents PCBs from entering the environment.

Note: Transportation equipment should be thoroughly cleaned before being used for other purposes. The cleaning of the equipment should not result in contamination of sewers, streams, or other areas not approved for disposal of PCBs.

4) If there are shallow wells in the surrounding area, sample the water from the wells and analyze for PCBs. Be sure the water from a contaminated well is not taken internally.