POLYCHLORINATED BIPHENYL (PCB) COMPOUNDS OR MIXTURES

In this response the phrase "PCB compound or mixture" includes those materials listed under Base Products in Exhibit A.

1. (a) Monsanto Industrial Chemicals Company does not import PCB compounds or mixtures. Amounts produced for 1971, 1972, 1973, 1974 and the first three quarters of 1975 are included in Exhibit C.

(b) Production facilities:

For 1971 and 1972

Monsanto Company
Box 249
Anniston, Alabama 36201

For 1971 to present

Monsanto Company
Route 3
Sauget, Illinois 62201

The amounts produced at the Anniston, Alabama plant are shown on Exhibit D. The Sauget, Illinois unit produced the amounts shown on Exhibit E. Wholesale and retail outlets are not used.

(c) See Exhibit F for 1971, Exhibit G for 1972, Exhibit H for 1973 and 1974 and Exhibit I for 1975. The PCB compounds or mixtures from the Anniston, Alabama facility are listed in Exhibit D. The remaining were shipped from the Sauget, Illinois facility.

2. (a) See Exhibit A - pages 2, 3 and 4 and Exhibit B.

(b) See Exhibit A - pages 2, 3 and 4.

(c) The PCB compounds or mixtures used were produced by Monsanto. See 1(b).

(d) Production facilities are those shown under 1(b) and for 1971 and 1972 also included Monsanto Company, 1700 South Second Street, St. Louis, Missouri 63177. Products distributed through Monsanto's Anniston, Alabama unit are shown on Exhibit D. All Pydraul products were distributed through the St. Louis, Missouri facility. Remainder of products distributed through the Sauget, Illinois unit. Amounts distributed are shown on the exhibits listed in 2c below.

TOWOLDMON0058199

(a) See Exhibit F for 1971, Exhibit G for 1972, Exhibit H for 1973 and 1974 and Exhibit I for 1975. The products obtained from the Anniston, Alabama facility are listed in Exhibit D. The Pydraul products originated at the St. Louis, Missouri unit. The remaining were shipped from the Sauget, Illinois facility. We do not manufacture consumer products containing PCB compounds or mixtures.

3. (a) During 1971 and 1972 PCB compounds or mixtures were used as heat transfer fluids, hydraulic fluids and in transformers and capacitors. During the latter part of 1972, 1973, 1974 and 1975 PCB compounds or mixtures are only present in transformers and capacitors.

(b) See Exhibit J. Amounts shown are for total Monsanto Company usage. No records are available to determine specific company facility. Inerteen was used in transformers. Pydrauls in air compressors. Therminols in industrial heat transfer systems.

(c) The PCB products were all produced by Monsanto Company. The specific sources are shown on Exhibit J.

4. PCB compounds or mixtures are not reclaimed.

5. (a) During 1971 and 1972 solid waste material contaminated with PCB compounds or mixtures were buried in a secure landfill located within a fenced area on property owned by Monsanto Company at the Anniston, Alabama facility. Similar waste has also been buried in a secure landfill located on Monsanto Company property at the Sauget, Illinois facility during the period 1971 - 1975. Liquid wastes have been disposed by incineration for the period 1971 - 1975 in a high temperature unit located at the Sauget, Illinois facility. During 1975 solid waste was sent to Texas Ecologists, P. O. Box 307, Robstown, Texas 78380.

(b) Waste materials containing PCB compounds or mixtures are received from many sources. The type of PCB compound or mixture in the waste is unknown. The concentration is also unknown. Solid waste is estimated as containing levels ranging from the ppm level to 50% by weight. Liquid waste is estimated to contain about 90% PCB compound or mixture.

For amounts disposed see Exhibit K. Note the amounts shown refer to the total weight of waste. The actual PCB content is unknown.

(c) See Exhibit K for total waste disposed. Concentration and type of PCB compound or mixture are unknown.

TOWOLDMON0058200

(d) See Exhibit L. Total amounts of waste are shown. Concentration and type of PCB compound or mixture are unknown.

(e) See 5a for name and location. See Exhibit K for amount disposed.

6. See Exhibit A. Monsanto Company does not import or reclaim PCB compounds or mixtures. Composition of disposed material is unknown but can range from ppm level to 100% by weight PCB.

7. (a) See Exhibit M for Sauget, Illinois facility waste effluent analyses. See Exhibit N for Anniston, Alabama facility water effluent analyses. For PCB emissions to the atmosphere at the Sauget, Illinois facility see Exhibit O. Analyses of air emissions were not made at the Anniston, Alabama facility.

(b) See Exhibits M, N and O.

(c) No information is available regarding the Anniston, Alabama facility. No information is available relating to PCB concentration in the air in the area of the Sauget, Illinois facility. Samples of the Mississippi River were taken in 1972. Results were as follows:

*Sample Date	Location	mg/l PCB
10/30/72	T.B. Bridge (downstream)	0.00012
12/13/72	Chain of Rocks Bridge (upstream)	0.0002 - 0.0004
12/12/72	N. of Ill. River (upstream)	0.0002 - 0.0004

*Analytical blank value at 0.00005-0.00017

8. (a) PCB compounds or mixtures are liquids and are transported in bulk or in steel drums.

(b) See Exhibit P for transporters of PCB compounds or mixtures from Monsanto facilities. Transporters of material returned for disposal can be any common carrier serving the St. Louis, Missouri area.

TOWOLDMON0058201

9. Monsanto Company is not aware of any occasion in which PCB compounds or mixtures were introduced into the environment which is not already known to representatives of the Environmental Protection Agency. Examples include the contamination of fish meal in North Carolina, the drainage of fluid from a transformer in transit in Tennessee and the leakage of fluid from a damaged transformer in the Duwamish waterway in Washington.

10. Monsanto Company is not aware of any health or environmental effects resulting from the introduction of PCB compounds or mixtures into the environment which has not been reported in the scientific and popular press and already known to representatives of the Environmental Protection Agency.

11. (a) Monsanto Company has received reports that about 1800 drums of PCB compounds or mixtures are being offered by a company located in the northeastern U.S. for sale for any application. This information was received from Mr. Robert Laham, Hub Fabric Leather Company, 7 Charlton Street, Everett, Massachusetts 02149. This has been discussed with a representative of the Environmental Protection Agency.

Recently Pyramid Chemical Sales Company, 1035 Virginia Drive, Fort Washington, Pennsylvania 19034 has advertised the availability for any application of Aroclor 1221, Aroclor 1232 and Arclor 5460. A representative of the Environmental Protection Agency has been informed.

TOWOLDMON0058202