W. B. Papageorge - B2NA

October 23, 1972

W. R. Corey - B2SL
J. F. Stapleton - B2SA

PCB - RALSTON-PURINA

Mr. C. P. Cunningham

On Friday, October 20, W. R. Corey, W. B. Papageorge and P. S. Park met with the following Ralston-Purina representatives: Dr. C. A. Hardin, Vice Chairman of the Board; Mr. M. C. Bahle, Assistant to the Chairman of the Board; and Mr. J. A. Fraser, General Counsel.

At the beginning of the discussion, Dr. Hardin did not appear to have a very good understanding of PCBs or their characteristics. Our discussion, together with the reading of material which we left with him, should help him to put the matter in proper perspective.

Wink Corey re-emphasized to Dr. Hardin that Monsanto will cooperate with Ralston-Purina concerning its PCB problems to the extent that legal considerations do not require us to do otherwise.

Monsanto's general worldwide program of restricted PCB sales to approved dielectric customers was outlined. The possibility that exceptions to this policy could occur was discussed. No customer names or specific situations were revealed. In response to Dr. Hardin's request for a list of the dielectric customers, he was informed that Monsanto's policy prohibited the sharing of this type of information with anyone, including governmental regulatory agencies. This response did not appear to bother him. During this part of the discussion Dr. Hardin asked if the number of customers was nearer 30, 300 or 3,000. He was told it was near 30. A copy of the General Electric comments filed with the Federal Interdepartmental Task Force on PCBs, which was left with Dr. Hardin, did contain the names of six or eight transformer manufacturers who use askarel fluid.

Mr. Fraser asked what assurances we could give relating to the control of PCBs by our customers and in turn their customers. We suggested that representatives of the capacitor and transformer industries would be better qualified to speak for the industry. In addition, we recommended that the American National Standards Institute (ANSI) Committee C-107, which is addressing itself to this problem, be contacted.

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Mr. Fraser asked if Monsanto had a program for helping customers with PCB problems. He was reminded that legal considerations place some limitations on our efforts but we tried to be helpful wherever possible. Mr. Fraser indicated that he believed Monsanto's assistance to Ralston-Purina in the Maine poultry contamination incident was inadequate.

Dr. Hardin is extremely interested in preventing a repeat of the Maine incident in any of Ralston-Purina's operations worldwide. We reminded him that the PCB problem is worldwide and we reviewed with him the problem of imports to this country, the evidence of PCB being produced by a small U.S. chemical firm and the names and locations of the current foreign producers. We shared with Dr. Hardin our estimate that Bayer in Germany was following Monsanto's program and is about one year behind us; Prodelac, representing Progil and Kuhlmann in France, is only recently taking steps to control PCBs; and the Italian and Spanish producers have shown no concern for the problem.

Dr. Hardin expressed his personal opinion that PCBs should be totally banned and asked if any work is underway for the development of alternative dielectric fluids. We assured him that considerable research has been and is being conducted but at present no acceptable substitute has been found. We also reminded him that if a fluid were found to be suitable it would take about three years before all of the product development, environmental impact, and toxicity studies were completed and the product was finally accepted.

Dr. Hardin indicated that Ralston-Purina was developing a very extensive program for evaluating its operations and its suppliers' operations for effective control of PCBs and wanted to know if Monsanto would be willing to help in the development of this program. We suggested that after Ralston-Purina representatives had reviewed the reading material we had given them that they inform us of any remaining specific needs and we would seriously consider their request, subject to the limitation outlined earlier.

At the end of our discussion Dr. Hardin informed us that his laboratory had tentatively identified PCBs (300 ppm) in a sample of our new Pydraul (phosphate ester base). We assured him that no PCBs are used in the formulation

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and the plants involved in the production of the ingredients and in the final blending do not have PCBs present. Dr. Hardin agreed that the laboratory should confirm its findings. We will follow-up with Ralston-Purina research people on this.

Copies of the following documents were left with Dr. Hardin:

Interdepartmental Task Force Report on PCBs

U.S. Department of Agriculture PCB Report

U.S. Tariff Commission 1971 Import Summary

Monsanto PCB Production and Sales Summary

Proposed FDA PCB Regulation

Monsanto Dielectric Customer Hold-Harmless Agreement

NIPCC Report on Electrical Insulating Fluids

G.E. and Westinghouse Reports on PCBs in Electrical Equipment

W. B. Papageorge

P. S. Park

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