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Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
Sauget, Illinois 62201
Phone: (618) 271-5835

April 6, 1977

Mr. M. W. Jones
National Institute for Occupational Safety and Health
Robert A. Taft Laboratories
4676 Columbia Parkway
Cincinnati, Ohio 45226

Dear Mr. Jones,

Thank you for the draft of your report which we have examined as you requested. The report refers to the catalyst used and the operator's job description on page 7 and in Appendix B gives a fair amount of detail about its use. Similarly the diatomaceous earth treatment is described in some detail including its purpose. This is the type of information which is a trade secret. Even though the manufacture of PCB in the USA will cease, we feel that it is only necessary to include detail which is relevant to the survey and we would suggest that the report merely state that the substances are added to process vessels as needed and the total exposure averages no more than 3 minutes per shift to these materials. For the purpose of the study of exposure, it is immaterial which vessel is used in this addition.

We have indicated a few corrections to the names and titles on the cover sheet. In the description of the facility on P. 1 benzene should be deleted as a product - it is a raw material but is not manufactured here. Also on P. 1 Monsanto restricted the sale of PCB to use in closed systems, i.e. it was only sold for use in closed systems. Either statement seems a little ambiguous!

In the Medical Program on P. 2 - all employees have pre-employment and annual physical examinations. Certain employees are required to take additional examinations or special tests. Industrial Hygiene matters are handled by the Environmental Control group, (not limited to Air Pollution).

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M. W. Jones

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Routine sampling is done on waste water discharged from the area. The statement on ventilation appears to us to lead towards misunderstanding. An outdoor plant is well ventilated and requires little forced ventilation which is no doubt what was meant. The work station has an exhaust fan and hood.

We have not commented on your recommendations as these are your prerogative. However, this does not infer concurrence with them.

We have marked up a copy of your report to suggest modifications in line with the above comments. Please call if you have any questions about our comments. We would appreciate receiving a copy of your final draft.

Yours truly,



P. E. Heisler
Director of Environmental
Control

/ghw

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