UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII
1860 LINCOLN STREET
DENVER, COLORADO 80295

RECEIVED
OCT 29 1979
J.W.H.

OCT 25 1979

REF: 8AH-TS

Mr. J. W. Hanley
President and Chairman of the Board
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63166

Dear Mr. Hanley:

This Agency received a telephone call from Mr. David Wood at Monsanto headquarters in St. Louis on October 3, 1979, alerting us to the possibility that seventeen drums of a Monsanto product, Therminol FR-1 (the polychlorinated biphenyl Aroclor 1242) might be stored on a farm near Lafayette, Colorado. The next day the Agency confirmed the initial report and collected samples from three of the drums. Laboratory analysis of the samples confirmed that they contained Aroclor 1242.

Further investigation revealed that the drums had been leaking so that some local contamination had occurred. Milk samples taken from the nursing mother in residence on the farm contained enough Aroclor to cause the Boulder County Health Department to recommend that she discontinue nursing her baby.

I understand that the current resident contacted Monsanto regarding the disposal of this product several years ago and feel that your involvement and notification to this Agency at that time would have been appropriate. Nevertheless, I was pleased with the background information and useful advice Mr. Wood provided during our initial investigation. The Agency has "overpacked" the original 55-gallon drums in new 85-gallon drums lined with absorbant material and they are now awaiting disposal.

While Monsanto may not be legally liable for this clean-up effort, your company is responsible for having introduced this product into the marketplace. Accordingly, I feel that it is in the public interest that Monsanto assist in this cleanup effort by collecting these drums and disposing of them properly. Soil which has been contaminated by leakage from the drums will also have to be cleaned up and disposed of along with other materials. This too may have to be done at public expense unless Monsanto assists in this effort.

PCB-ARCH-EXT0376832

Thank you for your company's prompt and helpful response. I will await your answer to this request.

Sincerely yours,

Roger L. Williams
Regional Administrator

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