Monsanto

SPECIALTY CHEMICALS DIVISION

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October 26, 1976

Mr. Robert A. Damiani
President
Radco Industries, Inc.
1480 Dean Street
St. Charles, Illinois 60174

Dear Bob:

We certainly enjoyed meeting with you and Dwaine Fowlkes for the purpose of updating Radco on Monsanto's position with regard to PCBs. More specifically, you will recall we discussed the following topics:

1. Monsanto's previous communications to customers regarding our concern with the potential hazards attendant with the continued use of PCBs.

2. State and Federal Legislation, both existing and proposed. Among others this included a review of the "Toxic Substance Bill" with the "Dingle Amendment" (this is now Section 6E of the Toxic Substances Control Act) and Sections 311 and 307A of the "Federal Water Pollution Control Act". You received copies of the AHEM's Room Air Conditioner Engineering Committee's summary of each state's 1976 PCB legislation, and the proposal rules for Section 307(a) of the "Federal Water Pollution Control Act" as printed in the Federal Register, Vol. 41, No. 143.

3. The extreme difficulty and high cost of decontaminating both equipment and environments where PCBs have been present.

4. Monsanto's position on PCBs, which can be very briefly stated as follows: Given the intent and direction of both existing and future legislation, it is our opinion that the preferred method for disposing of PCBs is through incineration. This method offers the lowest probability of further contamination of environments.

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5. Irrespective of the success of distillation in eliminating PCBs and PCTs from phosphate ester hydraulic fluids, it is possible that the remaining middle-cut returned to the users will differ from the original formulation supplied as a hydraulic fluid. Monsanto is not therefore in a position to endorse the use of such a phosphate ester fraction as a fluid equivalent in performance to the original formulated product.

6. One further matter which we wish to bring to your attention concerns the reclamation of Monsanto's current line of heat transfer fluids such as Therminol® 66 and VP-1. As you know, these products are not PCBs. In the case of customers using Therminol VP-1 and desiring to reclaim fluid, Radco is one of the reclaimers we would suggest they contact. Obviously, it would be a matter of real concern if any of our Therminol heat transfer products became PCB-contaminated during reclamation. We would like to receive assurances that such will not be the case.

Bob, I realize it is difficult to cover all aspects of the PCB issue in one afternoon, however, I do believe we have provided Radco with information on this topic which may be helpful to you.

Sincerely,

W. H. Slowikowski
Market Manager
Hydraulics and Lubricants

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