Monsanto

Incorporated in Victoria

Monsanto Australia Limited
East Tower Princes Gate
161 Flinders Street Melbourne
Postal Box 4077 Mail Exchange
Melbourne Victoria 3001

Phone 654-4333 Telex 30-788
Telegrams 'Monsanto' Melbourne

30th March, 1972.

The Manager,
Wilson Electric Transformer Co. Pty. Ltd.,
310 Springvale Road,
GLEN WAVERLEY 3150, Vic.

Dear Sir,

As you have probably heard, Monsanto is engaged in a voluntary program to limit sales of products containing polychlorinated biphenyls to uses as a dielectric in manufacture of transformers and capacitors from which escape of PCB's to the environment can be prevented by our customers.

This action has been taken because of Monsanto's concern about certain studies which indicate PCB's may be accumulating in the environment, and in some instances, have been found in food or in the food chain. As a purchaser of PCB-containing products, we feel certain you are aware of the interest and concern being demonstrated around the world by scientists about this problem. Nevertheless, we call to your special attention the attached article on PCB's by Carl G. Gustafson of the United States Federal Water Quality Administration appearing in "Environmental Science and Technology".

We believe if you are fully advised of the potential problems associated with the continued use of PCB-containing products (in these applications) you can, by the exercise of care and appropriate cautionary warnings to your customers, and the exercise of care on their part, assure that PCB's purchased by you do not escape into the environment.

Monsanto would like to continue to sell you its PCB-containing products for use as a dielectric fluid on its normal sales

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Conditions, but must make such sales subject to the undertakings requested below. You will appreciate that we must also reserve the right to change our sales policy as additional facts may become known about PCB's.

The undertakings with which we would request you to agree are as follows:

1. You agree to use Monsanto's PCB-containing products only as dielectric fluids in capacitors and transformers.

2. You acknowledge that you have been advised by us of and that you are aware of the potential harm to the environment and to food and the food chain by the escape of PCB's into the environment.

3. You agree to take all care in handling use and disposal of PCB's to ensure they do not enter the environment and to so advise your customers.

4. You acknowledge receipt of the attached handling precautions for Monsanto's PCB-containing products.

5. You agree to notify your customers of the hazards of PCB's.

If you agree to the above, would you kindly sign and return to us the enclosed duplicate of this letter where indicated. To enable us to give you satisfactory servicing on your future orders, your prompt reply would be appreciated.

Yours faithfully,
MONSANTO AUSTRALIA LIMITED.

R.F. Garnsworthy,
Product Manager - Chemicals.

Encs.

We agree to the foregoing

DSW 020456

Monsanto

porated in Victoria

Monsanto Australia Limited
East Tower Princes Gate
151 Flinders Street Melbourne
Postal Box 4077 Mail Exchange
Melbourne Victoria 3001

Phone 654-4333 Telex 30-238
Telegrams 'Monsanto' Melbourne

30th March, 1972.

The Manager,
General Electric Co. of Australia,
G.P.O. Box 4C6F,
BRISBANE 4001, Queensland.

Dear Sir,

As you have probably heard, Monsanto is engaged in a voluntary program to limit sales of products containing polychlorinated biphenyls to uses as a dielectric in manufacture of transformers and capacitors from which escape of PCB's to the environment can be prevented by our customers.

This action has been taken because of Monsanto's concern about certain studies which indicate PCB's may be accumulating in the environment, and in some instances, have been found in food or in the food chain. As a purchaser of PCB-containing products, we feel certain you are aware of the interest and concern being demonstrated around the world by scientists about this problem. Nevertheless, we call to your special attention the attached article on PCB's by Carl G. Gustafson of the United States Federal Water Quality Administration appearing in "Environmental Science and Technology".

We believe if you are fully advised of the potential problems associated with the continued use of PCB-containing products (in these applications) you can, by the exercise of care and appropriate cautionary warnings to your customers, and the exercise of care on their part, assure that PCB's purchased by you do not escape into the environment.

Monsanto would like to continue to sell you its PCB-containing products for use as a dielectric fluid on its normal sales

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DSW 020457

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Conditions, but must make such sales subject to the undertakings requested below. You will appreciate that we must also reserve the right to change our sales policy as additional facts may become known about PCB's.

The undertakings with which we would request you to agree are as follows:

1. You agree to use Monsanto's PCB-containing products only as dielectric fluids in capacitors and transformers.

2. You acknowledge that you have been advised by us of and that you are aware of the potential harm to the environment and to food and the food chain by the escape of PCB's into the environment.

3. You agree to take all care in handling use and disposal of PCB's to ensure they do not enter the environment and to so advise your customers.

4. You acknowledge receipt of the attached handling precautions for Monsanto's PCB-containing products.

5. You agree to notify your customers of the hazards of PCB's.

If you agree to the above, would you kindly sign and return to us the enclosed duplicate of this letter where indicated. To enable us to give you satisfactory servicing on your future orders, your prompt reply would be appreciated.

Yours faithfully,
MONSANTO AUSTRALIA LIMITED.

R.F. Garnsworthy
Product Manager - Chemicals.

Encs.

We agree to the foregoing

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DSW 020458

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Monsanto

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

March 20, 1974

Ms. R. L. Lambert
Standards Section, Division of Air Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Ill 62706

Dear Ms. Lambert,

In answer to the questions posed in your letter of February 25 I have the following information.

Q1. Are you presently monitoring your sources for PCB emission.

A. We monitor the aqueous effluent from all areas in our plant where PCB is handled. We monitor the stack gas from the Incinerator, which is used for the destruction of used Aroclor returned from customers, in accordance with the terms of the operating permit issued for the Incinerator.

Q2. What is the method of Monitoring and Analysis.

A. See Attachment (1) Monsanto Methodology for Aroclors. In order to sample the stack gas from the wet scrubber on the incinerator we use the EPA train described in APTD 0581. The gas is filtered, cooled to condense water vapor and then scrubbed with an appropriate solvent to collect PCB. We have found Di-methyl formamide to be a more suitable solvent than toluene because it can absorb water vapor and its vapor can be trapped by a water scrubber. The material collected on the filter, the condensate and the solvent are analyzed by the methods described.

Q3. What is the annual Production.

A. 21,000 tons of Aroclor were produced in 1973 and it is expected that a similar amount will be produced in 1974.

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Q4. What are the raw materials.
A. Around 10,000 tons of biphenyl and 15,000 tons of chlorine will be used in 1974.

Q5. What are the present safety standards for PCB manufacturing.

A. The W.G. Krummrich Plant makes every effort to, as a minimum, conform with the state and federal requirements with respect to the safety and health of its employees. Personnel in all departments receive adequate instruction in the safe handling of the raw materials and finished products they encounter. All personnel receive regular medical examination. Every indication is that good industrial hygiene, as practiced at this plant, is sufficient to avoid any adverse effects.

In the OSHA standards TLV for Chloro diphenyl 42% is given as 1.0 mg/m³; 52% is given as 0.5 mg/m³.

Q6. How is Monsanto controlling PCB emissions.

A. More detail on this subject is contained in Attachment (2) 'Polychlorinated Biphenyl'. As far as emissions to atmosphere is concerned, the process is essentially a closed system. The principal off gas stream is cooled and scrubbed with a high boiling (low vapor pressure) Aroclor. A high efficiency mist eliminator removes any entrained material and the gas passes to another manufacturing process where it is absorbed. A small amount of air in the gas stream is removed through a water scrubber.

The material has a very low vapor pressure and a nitrogen blanketing system is in use on storage vessels.

Q7. How is Aroclor being used.

A. Presently the sole use for Aroclor is in the electrical industry as a dielectric fluid.

Very truly yours,

Clarence F. Buckley

Clarence F. Buckley,
Engineering Specialist,
Environmental Control

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attach. (1) Monsanto Methodology for Aroclors
(2) Polychlorinated Biphenyl (PCB)

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