Monsanto
COMPANY

800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
(314) OXford 4-1000

March 5, 1973

Mr. E. L. Raab
General Electric Company
Transformer Division
Building 11-223
100 Woodlawn Avenue
Pittsfield, Massachusetts 01201

Dear Ed:

Enclosed is a proposal submitted by Mr. R. L. Derby, Dow Chemical Company, relating to the handling, shipping and disposal of Askarel wastes.

Mr. Derby has asked that our transformer working committee of ANSI C-107 consider this proposal. Mr. Derby is also willing to discuss his proposal with the members of the transformer subcommittee, either at a meeting at which all members are present or at two smaller groups, whichever is appropriate.

May I have your comments relating to the interest in Mr. Derby's proposal.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure

cc: Mr. R. L. Derby - Dow Chemical Company
Mr. A. M. Salazar - N.E.M.A.

ACM CC7559

EXHIBIT
P20-B

-2-

EXHIBIT A

STLCOPCB4023577

PROPOSAL

A system for handling, shipping and disposing of transformer grade, sample service askarel wastes to provide environmental safety.

Servicing of askarel-containing transformers requires the drawing of representative samples of the fluid. Generally, two to four quarts are obtained from the main drain valve and an additional quart from the sample bottle rinse. The procedure is repeated for a transformer top sample. The waste quantity will vary from one to two gallons per transformer, depending on service company procedure. Integrity of containers presents a problem, as does the possibility of accidental spills during handling. Such spills could result in sewer or ground contamination. In addition, prolonged storage and deterioration of the filled containers could cause leakage and further contamination. Another potential source of contamination is damage during shipping. Lack of a simple, efficient disposal system may be the reason for unauthorized disposal of the askarel wastes into rivers and streams.

Standardized containers and collection procedures, a means of solidifying the askarel wastes, and authorized disposal should help eliminate the environmental threat.

The system we propose is as follows:

Providing a fiberboard carton containing four one-gallon plastic cube containers with appropriate closures and a four-pack fiberboard pre-addressed package.

Each cube container will be loaded with a pre-determined quantity of Dow Imbiber Beads, a product that will solidify the waste askarels within minutes.

The outer package is pre-addressed for delivery to an authorized solid waste incinerator or supervised dry land fill site for disposal.

The advantages of the system we propose are:

- A standard container for disposal.
- A method for solidifying the askarel wastes to prevent leaks or other accidental contaminating spills.
- A method of environmentally sound containment when disposed of in dry land fill and assurance that such disposal will be accomplished by authorized personnel and procedures.
- A product and container that meets the requirements for environmentally sound high temperature incinerator disposal.

ADM CC75cC

Exhibit A

STLCOPCB4023578