ATTACHMENT I

Monsanto

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 694-1000

June 28, 1979

Document Control Officer (TS-793)
Office of Toxic Substances
U. S. Environmental Protection Agency
401 M Street, S. W.
Washington, D. C. 20460

Attention: Docket Number OTS/066002 (PCB/PDE)

Re: Petition for Exemption from PCB Processing Prohibition

Dear Sirs:

Monsanto Company hereby petitions for exemption from the polychlorinated biphenyl (PCB) processing prohibition under section 6(e)(3)(A)(ii) of the Toxic Substances Control Act (TOSCA). This request is made pursuant to section 750.31 of the Interim Procedural Rules for Processing and Distribution in Commerce Exemptions as published in the Federal Register, Volume 44, Number 106, dated May 31, 1979, beginning on page 31560.

This petition specifically requests an exemption for a period of one year in order to continue using phthalocyanine pigments for the coloring of plastic materials in our plastics processing facilities at Springfield, Massachusetts; Addyston, Ohio; Muscatine, Iowa; and Pensacola, Florida. Attached is a summary sheet providing the required information on our Company, the location of sites needing exemption, and the estimated consumption of phthalocyanine pigments and amount of PCB contained therein at each site.

The plastic products in which phthalocyanine pigments are used contain far less than 50 ppm PCB because of the dilution that occurs when the pigment is mixed with the plastic materials being colored. It is our understanding that pigment producers have efforts underway to develop alternative processes for manufacturing phthalocyanine pigments without PCB contamination, and that changes are expected over a period of a year or two. We contend, therefore, that granting of this petition would not

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result in "an unreasonable risk of injury to health or environment," and that good faith efforts are being made "to develop a chemical substance which does not present an unreasonable risk of injury to health or environment" as stipulated, respectively, under sections 6(e)(3)(B)(i) and 6(e)(3)(B)(ii) of TOSCA.

In the meantime, we must continue to use the phthalocyanine pigments now distributed in commerce, as substitute colorants are not available. The concentration of these pigments in our plastic materials ranges from the low parts per million (ppm) to about the two percent level. Our inability to use these pigments would affect approximately 200-300 million pounds of plastics production at our plants, and would result in either a curtailment of production or alternately severe economic dislocation.

We believe that the above fulfills the information requirements as described in section 750.31(d) of the Interim Procedural Rules, and justifies granting this petition for exemption from the PCB ban.

Sincerely yours,

W R Corey

W. R. Corey
Director
TOSCA Administration

Attachment

bcc: W. R. Corey
N. B. Galluzzo
R. H. Schlattman

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MONSANTO COMPANY

ESTIMATED 1980 PIGMENT/PCB VOLUME

Monsanto Location	Pounds, Dry Basis	
	Phthalocyanine	PCB
Monsanto Company Headquarters 800 N. Lindbergh Blvd. St. Louis, MO 63166 (314) 694-1000	--	--
Springfield Plant 730 Worchester Street Indian Orchard, MA 01151	7,000	1.40
Port Plastics Plant Addyston, OH 45001	18,300	3.66
Muscatine Plant P.O. Box 473 Muscatine, IO 52761	900	0.18
Pensacola Plant P.O. Box 12830 Pensacola, FL 32575	4,000	0.80
	30,200	6.04

Notes:
1. Both phthalocyanine blues and greens are included.
2. The average PCB content of the phthalocyanine pigments is assumed to be 200 ppm.
3. The pigments are introduced into a closed processing system for coloring the plastics materials.

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