Monsanto

FROM (NAME & LOCATION): J. C. Masson-E1ND
D. Wood -B2SD

DATE: July 14, 1978

CC: G. D. Glasgow - 1250

SUBJECT: PCB in Heat Transfer Systems

REFERENCE:

TO: C. F. Callis
W. D. Carpenter
J. B. Duncan
C. E. Hathaway
W. B. Papageorge
R. H. Schlattman

EPA will be conducting hearings on a proposed final PCB regulation August 21. As drafted, the regulation would prohibit the use or promulgation of any system containing more than 50 ppm PCB. There are certain "authorizations" for exception to this rule.

In Monsanto, we have identified 25 systems which had PCB fluids prior to 1970-72. They were changed out to Therminol 55 or 66 at that time, but due to incomplete flushing, still may contain residual PCB.

Attached to this memo is a list of such locations in your operating company. We would like you to do the following:

1. Immediately request that the systems be sampled (from the main operating loop 1 ml in glass vial) and sent (padded) through Company mail, appropriately identified to G. D. Glasgow, mail zone 1250 (Dayton). This should be done by 7/20.

2. We would appreciate any data on "makeup" to these systems since conversion (gallons/year). Additionally, it would be helpful if total system volume could be confirmed. If any prior data on PCB level exists, it would be useful. Send to D. Wood - B2SD.

We intend to use this data to show the potential extent of change-over necessary in the heat transfer use of PCB and based on this, request an authorization for a one year grace period and a 500 ppm limit.

Thank you.

J. C. Masson

D. Wood

EX P-3248
Page 1 of 6

July 14, 1978

THERMINOL FR CONVERSIONS

Monsanto Research - Creve Coeur, St.Louis "N" Building

A research pilot plant was drained in 1971-72. Fill was 150 gallons.

PCB-ARCH-EXT0380015

HT 14

July 14, 1978

THERMINOL FR CONVERSION

Monsanto Research Dayton, Ohio

In 1971-72 converted small 5 KW electrically heated pilot system. Drained and deactivated at that time. Fill approximately 50 gallons.

PCB-ARCH-EXT0380016

HT 15

July 14, 1978

THERMINOL FR CONVERSIONS

Mound Laboratory Miamisburg, Ohio

Small 50 gallon system drained. Data refused on fate of fluid because of conflict with AEC contract.

PCB-ARCH-EXT0380017

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Gene Trowbler -
Please handle
and copy me on.

Gene -
I have already contacted Jerry Brown
to get samples Don.

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DSW 022551

J. C. Masson

D. Wood

July 14, 1978

THERMINOL FR CONVERSION

Anniston

A. P_2S_5 Department. 990 gallon fill in product cooling loop. High percentage drainage before refill.

B. Indicated 4000 gallon usage in part of Santowax Q system. Present status unclear. Contact Burns Severson.

DSW D22552

PCB-ARCH-EXT0379931