Disposal

OCT 24 REC'D

BCC: [illegible]-W. Ault
1740-L. Bunsterff
1740-L. Russo
[illegible]-C.B. Sigler
[illegible]-H.R. Ford
CP/[illegible]
[illegible]-W.B. Papageorge
[illegible]-J.F. Stapleton
PWG/File

OCT 25 1972

October 20, 1972

Mr. R. L. Kilgore
Dept. 49-11, Zone 256
Lockheed Georgia
Marietta, Ga. 30660

Dear Mr. Kilgore:

Confirming my phone conversation of Oct. 20, 1972 with Mr. Burson concerning the incineration of your Therminol fluids, I am enclosing 25 pre-addressed drum return labels marked "disposal only". You will need to clearly indicate the drum contents on each label.

We request you use return drums that meet DOT 17H Specification (55 gallon drums, 18 gauge minimum, 2 bung head; 5 gallon drums, 24 gauge minimum) to prevent leakage. The outside of the drums must be free of fluid and leaks. Clean-up or other costs affecting the carrier related to fluid leaking from drums will be charged to the shipper.

Please show our return identification number "6238" on the freight bill of lading and on each drum. Ship the drums freight prepaid to:

Monsanto Company
Department 245, Incinerator
Sauget, Illinois 62201

We will invoice you for incineration as per Dr. Paton's May 25, 1972 letter, attached. Please advise if you want us to invoice against a specific purchase order.

As I stated to Mr. Burson, Dr. Paton's letter was originally addressed to "Plant Manager" and to "Mr. Dan Davis, Purchasing".

Please note, we cannot handle aqueous solutions or solids (i.e. sawdust, rags or sludge). For these materials, we suggest you check local authorities and your own environmental department for an approved method of disposal. Our Sauget plant is instructed to refuse receipt of containers containing solids, and to return same to the sender at the sender's expense.

I cannot offer credit for the 6 drums of unused Therminol FR fluid. March 1, 1972 was the time limit for this offer as per our Mr. Bergen's Dec. 15, 1972 letter which was sent via registered mail addressed to "Director of Purchases" at Lockheed, Marietta, Georgia.

MONS 094546

Mr. R. L. Kilgore
Lockheed Georgia
October 20, 1972

It is my understanding from Mr. Burson that the 6 drums of new FR fluid and the approximately 600 gallons of used FR fluid (drained from your system) is the total fluid on hand at the time you shut down your autoclave system. Also, that your Charleston, S.C. site never used Therminol FR fluid and, therefore, have nowhere to return for incineration.

Although your heat exchange system is being converted to steam, we do suggest you consider an organic fluid flush (as per our conversion bulletin) to further reduce possibility of residual FR in the system.

PCB Background Information

I have enclosed for your interest an article from the Wall Street Journal which gives a good summary of the PCB situation, and the FDA Task Force, a summary article on PCB's.

Thank you for your cooperation. Please feel free to contact me at (314) 694-2514 if you have any additional questions.

Sincerely,

Paul W. Gunn
Project Coordinator
Heat Transfer Fluids

PWG/ms

Enclosures: Return Shipping Labels -25 to Fouget, Illinois
Dr. Patom's May 25, 1972 Letter
Wall Street Journal Article 5/20/72
FDA Task Force on PCB's

CC: 1-Jim Burson
Dept. 55-11, Zone 376
2- [redacted] Pitman
Dept. 52-84, Zone 479

6 Drums, New (no credit)
12 Drums, FR Drain
18 TOTAL

MONS 094547

Blind Note To H. R. Ford
C. Paton
D. Roush
W. Papageorge
J. Stapleton

1. Lloyd Pitman, Purchasing, Lockheed, Oct. 19, 1972 discussion:

   a) Director of Material June 5, 1972 memo advised that Lockheed would dispose FR fluid in plant incinerator - would not utilize Monsanto.

   b) Autoclave modifications for conversion to steam to start July, 1972.

2. Jim Burson, Industrial Hygienist, Lockhead; Oct. 19, 1972:

   a) In process of converting autoclaves to steam.

   b) Based upon previous FR purchases, must have had a leaky system. Plant did take action to reduce leaks upon receipt of Monsanto's Dec. 15, 1972 letter. Fluid leaks would eventually go to storm drains - and on to the environment.

   c) A few months ago (i.e. spring 1972), system had a major rupture - resulting in a major loss of fluid (presumably, much to the storm sewers). Two workmen, who entered equipment, received major saturation of Therminol FR. These men went through an extensive medical examination and are still being monitored. No ill effects or medical problems have occured to date. The men involved do not know background of the PCB environmental issue.

   d) Oct. 20, 1972, Burson said decision to incinerate changed. Incinerator runs 200°F less than recommended for PCB's. Therefor they will send fluid to Sauget for incineration.

PWG