MALLORY CAPACITOR COMPANY
a division of P. R. MALLORY & CO. INC.
3029 E. Washington St., Indianapolis, Indiana 46206 Telephone 317-636-5353/Twx 317-[illegible]

PLEASE REPLY TO: Post Office Box 372, Indianapolis, Indiana 46206

March 16, 1976

Mr. Dave Wood
Monsanto Chemical Company
800 North Lindenbergh Boulevard
St. Louis, MO 63166

Dear Dave:

Enclosed find three groups of questions which we propose for discussion during our pending conference telephone call.

1. Three questions presented by Dr. S. P. Wolsky, Mallory Vice President in charge of our Laboratory for Physical Science located at Burlington, Mass, as well as Vice President for Environmental Affairs.

2. Four questions regarding employee physicals presented by Suzanne Bellamy, a member of the Mallory Legal Staff.

3. A description of our impregnation cycles and four miscellaneous questions presented by the writer.

Will phone you in a few days to set up conference call.

Sincerely,

C. P. Dibble
General Manager

CPD/pld

P.S. Just received call from James Alley stating that Monsanto personnel involved now request Mallory personnel plan to have meeting at St. Louis.

Will advise after contacting Dr. Wolsky.

DSW 020140

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Personnel exposure to PCB's in our plant is confined to the impregnation room.

Presently, exposure is either one of two forms:

A. Liquid

Capacitors, after completion of the impregnation cycle, are removed from the tank by use of a lift truck, with all external surfaces of capacitors, as well as metal baskets containing capacitors and inner walls of impregnation tanks, covered with oil.

They are transported to and transferred from the lift truck to a roller conveyor where operators wear rubber gloves and aprons. The lift truck and conveyor is equipped so that practically all spillage or drippings of Aroclor is contained.

B. Vapors

The fill hole is solder-closed on the roller conveyor. The capacitors are then transferred to other baskets which are attached to an overhead conveyor, which travels through a trichlorethelene wash, and then through a gas fired oven to test for leakers. The overhead conveyor is continuous and later presents finished units to the final test.

The station at the "solder-fill hole" closing operation is ventilated so that operators do not inhale an excessive amount of fumes. Operators wear rubber gloves and aprons at every station where wet capacitors are handled prior to trichlorethelene cleaning.

Recent air sampling indicates atmosphere to be less than .5 mg/m^3 with most samples reading approximately .2 mg/m^3.

A new proprietary process, scheduled to be fully in operation by April 30, 1976, will result in having all external surfaces, including capacitors, baskets and inner walls of impregnation tank, completely free of Aroclor liquid prior to opening impregnation tanks.

This process has been successfully implemented and is in operation on 20% of our impregnation tanks presently.

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MANDATORY

When completely implemented (April 30), all external surfaces of capacitors, baskets and inner walls of the impregnation tanks will be completely free of Aroclor liquid and vapors should approach "0."

Plant management is particularly apprehensive toward announcing an employee physical program.

They argue that such a program in a community the size of Waynesboro, Tennessee (population 1,700-1,800) by its complexity requires a longer implementation time. That the new process, scheduled for completion on April 30, results in a closed system with minute amounts of vapor

They further argue that time required to implement an employee physical program may approximate date of withdrawal of Aroclor from the marketplace by Monsanto.

Questions:

1. With the above knowledge and description of today's process under which the TLV atmosphere readings are under .5 mg PCB/m^3 as compared to OSHA TLV of 1.0 mg PCB/m^3, and anticipating that under the new process, which will be implemented by April 30, 1976, that the concentration of PCB's will be .1 mg/m^3 or less, do you feel that employee physical exams are warranted?

2. NIOSH is currently surveying Aerovox, examining their employee health records over the past 25 years. Our Waynesboro plant has been in operation approximately six years.

   Should a decision regarding the instituting of physicals be delayed until the NIOSH-Aerovox investigation is available?

3. Concern regarding dioxanes has been raised, on heating PCB's.

   Under what conditions are they formed? Is air and oxygen also required? If so, are dioxanes a concern under Mallory's present impregnation process? Under Mallory's new impregnation process.

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3/16/76
CPD/pld

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