BC bcc: Ray Ford - ATLANTA

February 3, 1971

Mr. Charles W. Biederman
Senior Engineer
Reynolds Metals Company
P. O. Box 520
Arkadelphia, Arkansas 71923

Dear Mr. Biederman:

Your letter dated January 22, 1971 addressed to Mr. Carl Clay was forwarded to me for response since I have been given the responsibility for studying the polychlorinated biphenyl problem.

Monsanto's Pydraul 312 does contain polychlorinated biphenyls (PCB), therefore every effort should be made to prevent it from entering any water systems, e.g. sewers, creeks, rivers, lakes, etc. Water containing PCB should be treated to remove the heavier fluid and finally passed through a bed of activated carbon to lower the PCB content to less than 10 parts per billion. This level is not officially established but we believe it represents an acceptable target.

Pydrauls which are no longer usable should be destroyed by incineration at temperatures exceeding 1600°F. Stack gases from the incineration must be scrubbed and neutralized to prevent HCl from escaping to the atmosphere. If incineration facilities are not available you may wish to send the scrap liquid to Monsanto Company, W. G. Krummrich Plant, Sauget, Illinois: Attention Supervisor Department 246. The cost of incineration is 3 cents per pound of liquid received and does not include freight or container costs.

Solid material contaminated with PCB should be segregated from other plant waste and buried in a properly operated landfill located away from any water systems.

The disposal methods I have described above apply specifically to Pydrauls formulated with persistent PCB

and could be followed to control the Pydraul 312 you are now using. As you probably know, we are reformulating our Pydrauls to eliminate the persistence problem and within the next two or three months the reformulated Pydrauls will have replaced all of the old formulations.

Regarding your request for analytical procedures for detecting PCB in water, I am enclosing copies of procedures used by Monsanto laboratories.

I hope you find this information useful. If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Environmental Control

WBP:ms

Enclosures

cc: Mr. Carl Clay - Monsanto Co.