Monsanto

FROM : W. R. Richard - T3A

DATE : September 1, 1971

SUBJECT : ALERT - AROCLOR 5460 AND AROCLOR 1221

REFERENCE :

TO : M. W. Farrar - 1760

cc: H. S. Bergen - B2SA
J. Mason - B2SA
W. B. Papageorge - B2NK
J. E. Springgate - B2SA
E. P. Wheeler - A2SA

The FDA is asking for 5-lb. quantities of Aroclor 5460 and Aroclor 1221 through Aroclor 1262 for feeding studies and teratogenic testing. EPA has also asked for Aroclor 1221, Aroclor 5060 and Aroclor 5460!

This is a clear signal that the chlorinated terphenyl Aroclor 5460 is on "the target list". Replacement products are indicated unless you gentlemen think that the above compounds will be medically acceptable.

W.R.

W. R. Richard

CWR
Have repeatedly asked our Marketing people about this. Their response is that A1221 and A5460 are O.K. Perhaps this will change.
Meanwhile, don't we need a sample coordinator on Aroclors similar to JFQ on Phosphate Esters?
MMWF

MONS 099126

PLAINTIFF'S EXHIBIT 42 4-1-98
PENGAD Bayonne, N.J.

WATER_PCB-SD0000017266

Pollution 916.07 1/5/71

CORRECTED 1/14/71

Reactor - Clarifier

ED&S TIME	30 MD @ $80	=	2400
PR&D	100 MD @ $100	=	10 000
Analytical	$102/day, ~~[illegible]~~ 83 days	=	8500
Mech Expense			7000
AFE 3715	(11M Total 4M spent in '70)		~~11 000~~
REPAIRS to 3715			2000
			$29 900

0% Anniston

Say 30 M

NONE OF THIS WORK WILL BENEFIT

THE ANNISTON PLANT. { WGK ? Newport ? Sales ?

Dump Control - MANAGE dump & transportation to minimize PCB escape

	ED&S TIME	20 MD @ $80	=	1600
90% Anniston	*ANALYTICAL	12 mud @ $34		410
~~40% others~~		30 H_2O @ $17		540
	MECH Exp.			10 550 **
				13100

to 826.03

* ANALYTICAL charges not included in 913.41 or 916.07 budgets.

** Maximum estimated - actual may be 25% to 50% of this.

Leaching Problems - Storm Drain, Bypass, Groundwater, Aroclor Dept and abandoned dumps.

50% Anniston	ED&S Time	10 MD @ $80	800
50% Others	*Analytical	(estimated)	500
	Mech Exp.		2000
			3300

* ANALYTICAL charges not included in 913.41 or 916.07.

DSW 013809

7/13/71

916.07

Clean Up Snows Creek – PCB Removal from Any Specified AREA from our fence to Chocco Locco.

1971 – AVOID IF POSSIBLE BUT PREPARE FOR ACTION –

	ED $s 10 MAN DAYS	= $800
50% Anniston	Mech Exp	= 200
50% Others		$1000

DSW 013810

1/13/71

Area Monitoring

	ED&S	6 @ 80	480
	Analyses (EGW "Routine")		15,550 IN EGW Budget?
90% Anniston	EGW Time		IN 914.31
10% Others	Mech Exp		2420
			18450 with analyses
			15550
			2900 without Analyses

Stream Monitoring

50% Anniston 50% others	Consultants G&S ANALYSES	IN 916.07 Budget

Disposal of Scrap - PCB containing materials - collect & dispose.

100% Anniston	ED&S 5 x 80	400
	Mech Exp.	300
		$700

Customer Consultations

10% others	ED&S 5 x 80	400
	Process 5 x 80	400
	Analytical	200 *
		$1000

* NOT INCLUDED IN EGW Budget

DSW 013811

WATER_PCB-SD0000017269

1/13/71

916.07

Spent Carbon Collection and Disposal

ED & S	TIME	40 x 80	= 3200
Process		10 x 80	800
Mech Eng			1000
			$5000

Miscellaneous

ED & S	14 x 80	1120
Process	10 x 80	800
Analyses		1000 *
Mech Eng		1000
		3920

* NOT INCLUDED IN EGW Budget.

WATER_PCB-SD0000017270

1/13/71

914.24

(time pit acct)

Rebuild No. 1 & No. 2 Pits (could be 916.07)

ED&S	40 x 80	3200
Mech Exp	No. 1	2000
	No. 2	5000
		$10,200

Clean outs (MAJOR REASON is PCB - 916.07 ?)

Pumping - $400/pump out - assume 10/yr	4000
ED&S 10 x $80	800
Complete pit clean outs 2 @ $10000	20000
ED&S 10 @ $80	800
	25600

These figures do not include cost of limestone or any other charges except those detailed above

Proposed split

80% Anniston
20% Others — Developing knowledge on limestone pit management

total 68,000 in 914.24 budget.

DSW 013813

Circle Pollution

Monsanto

FROM NAME & LOCATION: J. C. Landwehr - Anniston Plant

DATE: January 20, 1971

cc: J. L. Corder
A. G. Hill
G. L. Jessee

SUBJECT: ANNISTON - 1971 AROCLOR WASTE COSTS

REFERENCE: 12/24/70, JRS/JCL

TO: J. R. Savage

General Offices

This revises estimates of my 12/15/70 memo for 1971 Aroclor Waste expenses. The rough numbers discussed with you on 1/18/71 have been further reviewed with some additional reductions being made. Expenditures under items 1-3 have been previously approved and are within approved budgets. Item 4 expenditures will be made only if necessary after review with the Production Superintendent concerned on a case basis.

1a)	Completion of Limestone Pit Upgrade to give Anniston two pits for switch operation with demonstrated capability not to exceed 2 lbs./day PCB on a monthly average basis with 6 pH without phosphoric acid or 4.5 pH with. (TSD - $3000, Mech. - $7000): 1971 Expense	$10,000
1b)	Limestone Pit Cleanout - same as in past except cleanouts to two/year from four due to sludge pumpout technique, improved design, and less discharge of HCl. (TSD - $1600, 10 pumpouts - $4000, 2 cleanouts $20,000)	$26,000
1c)	Regular Limestone Consumption & Misc. Expense (Based on '71 Aroclor forecast and 73% overall HCl recovery)	$20,000
	Total estimated to 914.24	$56,000
	1971 Budget	$68,712

With present practice for distributing 914.24 based on chlorine usage, only 2% of this cost center will go against Liquid Aroclor.

We proposed that a 20% distribution of developmental expenses be made to other locations benefiting from this technology; 20% of 1a) + 1b)..... $7200*

2) Reactor - Clarifier Pilot Study

AFE 3715 ($11 M total, $4 M spent in 1970) - $ 7,000

PR&D, 100 mandays	10,000	
TSD, 30 mandays	2,400	
Sustaining mechanical expense	~~2,000~~	
Analytical, 500 samples @ $17	8,500	
	$29,900	$30,000*

DSW 013774

WATER_PCB-SD0000017272

Item 2 - continued

It is proposed that this expense be distributed 100% to other benefiting locations.

NOTE: Full scale Reactor-Clarifier facility for Anniston is deferred due to low liquid Aroclor production. A later decision would be governed by 1) levels of PCB persisting as result of solid Aroclor operation and leaching out, 2) attitude of Alabama Water Improvement Commission or its successor, 3) effectiveness of reactor-clarifier on chlorinated terphenyls and need to reduce terphenyl discharge. To establish point 3), a trace analysis for PCT is under development. Until this is available, pilot unit samples extracted with hexane will be retained for later PCT analysis.

3. Biological Consultants, Residue and Plant Effluent Control

3 Surveys in 1971 @ $4350	$13,050
250 Residue analyses of target species @ $56 -	13,300
(2 Year contract will include 4 surveys in 1972 and 1 in 1973)	26,350
1 Daily effluent for AWIC @ $17 -	6,200
4/Week inside plant and 3/week specials @ $17 -	6,200
	$12,400

This work can be done within 1971 916.07 budget of $39,048. Since 2/3 of this work is development of knowledge of ecological effects, we proposed distributing 50% to other locations.
50% of $38,750..... $19,400*

4. Projected business protection type work which will exceed budget and will be done only on Production Superintendent's approval on a case basis.

a) Dump control - manage dump and transportation to minimize PCB escape

TSD 20 mandays	$1600	
Analytical 12 mud @ $34	410	
30 H_2O @ $17	540	
Mech. expense	10,550 max.	$2,500 min.
	$13,100 max.	$5,000 min.

DSW 013775

WATER_PCB-SD0000017273

Item 4 - continued

b) Leaching problems - storm drain, pit bypass, ground water under Aroclor department, and abandoned dumps.

TSD, 10 mandays	$800		
Analytical	500		
Mech. expense	2,000 max.		0 min.
	$3,300 max.	-	0 min.

c) Clean up Snows Creek and Area Monitoring
PCB removal from any area from our fence to Choccolocco - avoid if possible, but be prepared for action;

For investigation:

TSD, 12 mandays	$1,000		
Analytical, included in 3.	-		
Mech. expense	2,000 max.		
	$3,000 max.		0 min.

d) Disposal of Scrap and Spent Carbon-PCB containing materials, collect and dispose; expense related to projects or investigations:

TSD, 50 mandays	$4,000	-	$2,000 min
Mech. expense	1,000 max.		0 min.
	$5,000 max.	-	$2,000 min.

e) Customer consultation and contingency $4,000 max. - 0 min.

TOTAL POTENTIAL BUDGET OVERRUN	$28,400 max.	-	$7,000 min.

J. C. Landwehr

:kd

DSW 013776

WATER_PCB-SD0000017274