Monsanto

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December 21, 1979

Mr. Roger L. Williams
Regional Administration, Region VIII
U.S. Environmental Protection Agency
1860 Lincoln Street
Denver, Colorado 80295

Dear Mr. Williams:

This will acknowledge your December 3 letter to Mr. Hanley which was forwarded to this office for action.

We were sorry to learn that you were unable to dispose of the drums of Therminol FR-1 during the Rollins test burn. As Mr. Wood indicated earlier, conversations with Rollins led us to believe that this was a realistic possibility. It's indeed unfortunate that it didn't work out.

With respect to your request for information relating to shipments of PCBs into Region VIII, we have examined our records with the objective of ascertaining how they might be used to provide you with meaningful information.

Here are our preliminary findings:

1) Prior to 1971 our computerized sales information on PCB products was entered on a "bill-to" rather than a "ship-to" basis. A search of these records would likely be an exercise in total futility in that there is no way to tell whether the location appearing on the record is indeed the location to which product was shipped.

2) We were, however, able to identify eight locations in Region VIII to which PCB heat-transfer fluids (the Therminol FR series) were shipped during 1969-1970. Sales records from these years were used as a basis to contact users during the voluntary notification program we undertook to switch customers to non-PCB fluids in the period 1971-1973. Our reports on that notification program show that we contacted the following companies in Region VIII:

Colorado (5 locations)

- Cotter Corporation, Cannon City -- drained a 1,000-gallon system and returned product to Monsanto for incineration.
- GAF, Denver -- drained a 50-gallon system and returned product to Monsanto for incineration.
- Lange, Bloomfield -- drained their system in 1972, converting to a Dow heat-transfer fluid. We have no data on the disposition made of their PCB fluid.
- Martin-Marietta, Denver -- drained their small system in 1972 and returned product to Monsanto for incineration.
- Benjamin Moore, Denver -- contacted but there is some question as to whether they actually had a system operating in Region VIII. This may be a "ship-to," "bill-to" problem.
- When we learned that the source of the drums at Lafayette, Colorado was Shortenda, a Colorado firm, we conducted a line-by-line manual search of our earlier computer runs which was feasible only because we had a name to look for. From this exercise we have concluded that the Lafayette material was probably purchased in 1967. Shortenda apparently took no material during the 1969-1970 period.

Utah (1 location)

- International Concrete, Salt Lake City -- drained and flushed a small 15-gallon system in 1972.

Wyoming (2 locations)

- Colorado Oil, Rock Springs -- converted a 700-gallon system in 1972 and returned product to Monsanto for incineration.
- Ginther Gas, Gilette -- contacted concerning a 500-gallon system. Final disposition of PCB material was not reported to Monsanto.

It seems unlikely that a difficult and inordinately time-consuming review of the same records, ten years later, would disclose additional customers.

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3) From 1972 until Monsanto exited the PCB business in total in 1977, our sales were restricted to manufacturers of electrical equipment such as capacitors, transformers and electromagnets and their service facilities. Sales were not made to users of such equipment or independent repair facilities. There were no manufacturing facilities in Region VIII to the best of our knowledge.

   Limited quantities of replacement fluid did from time to time move to General Electric and Westinghouse service repair shops in Region VIII. For example, a review of 1972-1973 records showed sales of 2,390 pounds to GE, Butte, Montana, in 1972, 4,050 pounds in 1973 and 8,100 pounds to GE's Denver, Colorado service center in 1973. Westinghouse shipments appear to have been limited to their service shops in Denver and Salt Lake City.

   It would be a formidable task (if not an impossible one) to identify every single shipment made to these service facilities in Region VIII.

   It's our best judgment that by far the preponderance of electrical grade PCB moved into Region VIII in finished, sealed electrical equipment via the manufacturers. This would suggest that any meaningful assessment of potential PCB presence in your region should probably focus on finished equipment -- an area where our records will not be helpful, i.e., we have no records showing the movement of finished electrical equipment into Region VIII or anywhere else.

4) Information on the movement of PCBs via smaller applications such as hydraulic fluids and vacuum pump fluids would involve a tedious, line-by-line manual search of our voluminous records which, in our opinion, would be of extremely dubious value. The reason we say this is that our experience is, based on historical distribution patterns in the industries that used these materials, that very minor quantities would have moved into Region VIII and certainly none from Monsanto since 1971.

   Accordingly, before anyone attempts to manually screen these records for the off-hand shipment, we wanted to communicate our preliminary findings and felt it appropriate to give you our perspective of what would be involved and what the likely results would be.

We hope that this information proves helpful. We will be pleased to discuss the assessment program with you further if you feel, after reviewing this information, that additional dialogue would be productive.

Sincerely yours,

Clayton F. Callis
Director, Environmental Operations

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