October 11, 1971

Mr. Kenneth D. Smith
Executive Vice President
American Dehydrators Association
800 West 47th Street
Kansas City, Missouri 64112

Dear Mr. Smith:

Mr. R. F. Southerland has informed me of your concern regarding the likely sources accounting for the presence of Aroclor 1242 in dehydrated alfalfa.

I must admit that I am not completely familiar with all possible exposures that alfalfa undergoes during growth and processing but from my knowledge of Aroclor applications I agree that it would be extremely unlikely that these materials would get into a product such as alfalfa except through accident or misapplication.

Examples of misapplication include use of spent transformer fluids containing Aroclors as solvents in the application of weed killers near railroad beds or under power distribution lines. Hopefully this practice has been discontinued.

Aroclors had in the past found limited application in some paint formulations. Could the alfalfa have been exposed to a surface with a deteriorating coating?

You refer in your letter of September 21 to the possible use of Aroclors in pesticides or herbicides. I am not aware of a recommended use in herbicides.

MONS 091609

115

In the late 1950's the U.S. Department of Agriculture had conducted some studies using Aroclors to extend the persistence of chlorinated hydrocarbon insecticides such as lindane. These formulations were recommended for use on hard surfaces to control insects such as roaches, silver fish and flies. They were never broadcast over crops. The use of Aroclors in insecticides was never extensive. For example, in 1969, only 15,000 pounds was sold through distributors for this application.

In October, 1970 the U.S. Department of Agriculture issued PR-75 banning the use of Aroclors in pesticide formulations within six months.

I hope this limited information is useful. If I can be of further service please let me know.

Sincerely,

W. B. Papageorge
Manager
Environmental Protection

WBP/er

cc: Dr. G. L. Romoser
Monsanto Company

Mr. R. F. Southerland
Monsanto Company