January 18, 1974

Dr. Martha Sager, Chairman
Effluent Standards and Water Quality
Information Advisory Committee
Environmental Protection Agency
Room 821, Crystal Mall, Building 2
Washington, D.C. 20460

Re: Environmental Protection Agency
(40 CFR Part 129)
Water Program
Proposed Toxic Pollutant Effluent Standards
Federal Register, Vol. 38, No. 247,
Pages 35388-35395
Thursday, December 27, 1973

Dear Dr. Sager:

Attached for your information is a copy of comments which we have forwarded to the Hearing Clerk, Environmental Protection Agency, in accordance with the Federal Register notice referenced above.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure

bcc: K. W. Easley
D. B. Hosmer

DSW 174536

STLCOPCB4049057

January 18, 1974

Hearing Clerk
U.S. Environmental Protection Agency
Washington, D.C. 20460

Re: Environmental Protection Agency
[40 CFR Part 129]
Water Program
Proposed Toxic Pollutant Effluent Standards
Federal Register, Vol. 38, No. 247,
Pages 35388-35395
Thursday, December 27, 1973

Gentlemen:

As a major producer and supplier of polychlorinated biphenyls (PCBs) to the electrical industry for fire resistant dielectric fluid applications, we have reviewed with considerable interest the effluent standards for these materials proposed in new Part 129, Subpart I, Chapter I of Title 40, Code of Federal Regulations.

We appreciate and concur with the Agency's intent to control the presence of persistent PCBs in the navigable waters of the United States to prevent environmental damage. We have already taken positive steps toward this end. We strongly support realistic action designed to prevent irresponsible introduction of persistent PCBs into the environment.

We note, however, with considerable dismay that proposals included in Subpart I are, in our considered opinion, unrealistically restrictive, not supported by currently available data and not warranted under the present conditions of manufacture and use.

In accordance with Section 104.6, Part 104, Chapter I of Title 40, Code of Federal Regulations, we offer the following objections. These objections indicate our deep concern for this matter and are in as much detail

DSW 174537

STLCOPCB4049058

as available time has allowed. We respectfully request an opportunity to present testimony describing our objections in greater detail at public hearings which we understand will be conducted at a future date.

1. We object to the unavailability of all the information used in the establishment of the proposed effluent standards. The short time available between the publication of the standards on December 27, 1973 and the published filing date of January 18, 1974; the unavailability of new Part 104, Title 40 CFR until January 4, 1974 and of the Statement of Basis and Purpose, Toxic Pollutant Effluent Standards until January 14, 1974, have prevented completion of a thorough evaluation of the proposed standards at this time. Further, a full copy of the EPA Water Quality Criteria dated October, 1973 is not yet available to us to review and evaluate nor is the long heralded report of the National Academy of Sciences and the National Academy of Engineering entitled "Water Quality Criteria, 1972."

2. We object to the proposed definition of polychlorinated biphenyls which implies that all the isomers have similar chemical, physical, toxicological, and degradation characteristics. Significant differences do exist and should be considered in developing a clear definition of those PCBs which affect the environment.

3. We object to the limitation of a maximum flow of 10,000 cubic feet per second in determining the quantity of PCBs which can be discharged into a stream, lake, estuary or coastal water. We find it difficult to understand the rationale which results in the conclusion that a PCB concentration which is acceptable in a slow moving body of water must be proportionately reduced when the flow exceeds an arbitrarily designated rate.

4. We object to the establishment of an effluent level for PCBs based on a concentration level which has been suggested as the threshold for salmon egg mortality. Information supporting the validity of this data is not available. Secondly, we seriously question that salmon truly qualify for the requirement under Section 307(a)(2) of the Act which states that the standard must take into account "....the usual or potential presence of the affected organisms...."

5. We object to the establishment of an effluent level for PCBs based on calculations in which a biological accumulation factor of 200,000 was used. Biomagnification observed in environmental samples has been reported as ranging from 1 to 200,000 fold varying with the type of PCBs and wildlife species studied. We question the appropriateness of using the non-typical higher value.

6. We object to the establishment of effluent standards for PCBs before the development of approved sampling and analytical procedures which will assure accurate and reproducible results when performed in qualified laboratories. Further, the proposed critical chronic limit for fresh water streams of 0.0012 ug/l is below the present normal limit of detection with the analysis performed by an experienced analyst using sensitive measuring equipment.

7. We object to the lack of a published statement containing a full and complete assessment of the economic impact of the proposed effluent standards, if adopted, as required by the National Environmental Policy Act of 1969.

8. We object to the establishment of the PCB effluent standards without acknowledgment and full consideration of the presence at point sources of significant quantities of residual PCBs due to past discharges. Because of this inherent background level and because of the extremely low levels which resulted from the use of unrealistic premises, to which we objected in our foregoing comments, the proposed PCB effluent standards are not, in our opinion, practicably attainable.

The Monsanto Industrial Chemicals Company has commented and made recommendations relating to the inclusion of PCBs on the Toxic Pollutants List and to the establishment of an effluent standard for our manufacturing facility to representatives of the Agency and to the Effluent Standards and Water Quality Information Advisory Committee. Copies of our comments are enclosed.

Our purpose in commenting on the proposed standards is to aid the Agency in the development of realistic effluent standards which will achieve the intended objectives without serious technical, social and economic disruptions.

To achieve our purpose we believe we must have access to, and review with Agency representatives, all of the information which was used in the establishment of the basis and purpose of the proposed PCB standard. We, therefore, respectfully request that the time period during which testimony is to be submitted and the dates on which the hearings will be conducted be extended.

Respectfully submitted,

W. B. Papageorge
Manager, Product Acceptability
Functional Product Groups

WBP/bt

Enclosure

January 18, 1974

Mr. B. J. Drucker
St. Louis Public Health Laboratories
Room 32
1320 Market Street
St. Louis, Missouri 63103

Dear Mr. Drucker:

Enclosed is the sample request form I offered to send you. If you will return the completed form to me I will arrange to have the requested samples forwarded to you.

I have also enclosed a copy of Monsanto's methodology for the determination of polychlorinated biphenyls which I hope you find interesting and informative.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosures-2

DSW 174541

STLCOPCB4049062

W. B. Papageorge - General Offices, BlND

January 17, 1974

FDA APPROVALS --
SANTOCEL

R. D. McDaniel - B2SJ
P. B. Salter - 5040
H. Teicher - N1A

Mr. B. K. Rogers
5420

Attached is a summary of appropriate regulations relating to the U.S. FDA's approval of the use of Santocels.

W. B. Papageorge

/bt

Attachment

DSW 174542

STLCOPCB4049063

January 16, 1974

Mr. John W. Carter
Anatomy Department
Health Science Center
University of Texas
7703 Floyd Curl
San Antonio, Texas 78284

Dear Mr. Carter:

I have received your request for a sample of Aroclor® 1242 and am forwarding this sample to you under separate cover.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

A-1242 s/n 1804

DSW 174543

STLCOPCB4049064

January 15, 1974

Mr. Earl J. Harris
Associate Analytical Chemist
Rome Pollution Laboratory
New York State Department
of Environmental Conservation
8314 Fish Hatchery Road
Rome, New York 13440

Dear Mr. Harris:

In response to your letter of January 9 requesting a sample of Aroclor 1016, I have enclosed a Request for Sample Quantity of Product Containing PCBs. If you will return the completed form I will arrange to have this sample forwarded to you.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure

DSW 174544

STLCOPCB4049065

January 15, 1974

Mr. Harold Sollenberger
Biology Instructor
East Noble High School
South Garden Street
Kendallville, Indiana 46755

Dear Mr. Sollenberger:

I have received your letter requesting PCB samples for your student, Clark Holliday, and have enclosed a Request for Sample Quantity of Product Containing PCBs. If you will return the completed form I will arrange to have these samples forwarded to you.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure-1

DSW 174545

January 15, 1974

Mr. Tim Croughan
Biology Department
Reed College
Portland, Oregon 97202

Dear Mr. Croughan:

Your letter of December 22, 1973 requesting Aroclor® samples has been forwarded to me for response.

Monsanto has never marketed its Aroclor® products as pesticides. These products are sold to industry as dielectric fluids for condensers or capacitors and transformers.

Enclosed is a Request for Sample Quantity of Product Containing Polychlorinated Biphenyls. If you will return the completed form to me I will arrange to have samples of Aroclor® 1242 and Aroclor® 1254 forwarded to you. I cannot provide samples of Aroclor® 1248 or Aroclor® 1260 as Monsanto has discontinued the manufacture of these products and our supply of samples has been depleted.

I have also enclosed copies of literature relating to polychlorinated biphenyls which I hope you find useful and informative.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosures A, B, C, D, E, F, M, O, P, Q, T, U, V, W, X, Y, Z, AA, BB, CC

DSW 174546

STLCOPCB4049067

W. B. Papageorge General Offices, B1ND

January 11, 1974

EPA - PENTA

H. S. Bergen - B2SL
K. W. Easley - 1920
B. G. Tibbetts - B2SE

Mr. E. P. Wheeler
A2SA

Attached is a copy of Warren Easley's memo relating to his recent discussions with Dr. Leonard Axelrod, EPA. Can you help us respond to Axelrod's comment that the expression "minimum detectable", as it relates to chloracne effects, meant nothing to him.

W. B. Papageorge

/bt

Attachment

DSW 174547

STLCOPCB4049068

January 11, 1974

Mr. W. T. Sullivan
Environmental Control G.O.
Caterpillar Tractor Company
Peoria, Illinois 61602

Dear Mr. Sullivan:

Your recent letter to Mr. D. B. Hosmer requesting information on polychlorinated biphenyls was forwarded to me for response.

I have enclosed a copy of the presentation I made to Dr. Martha Sager's Committee on November 29, 1973 and I have also included a collection of material which I hope you find useful.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosures

cc: Mr. D. B. Hosmer

DSW 174548

STLCOPCB4049069

W. B. Papageorge - General Offices, B1ND

January 11, 1974

DEQUEST 2041 - MATERIAL
SAFETY DATA SHEET

In Turn to:

R. D. Hogue - N1A
J. T. Garrett - A2SA
W. B. Papageorge - B1ND

I have received a request from a customer for a Material Safety Data Sheet covering our Dequest 2041.

Attached is a draft of a data sheet for this product. Will each of you please fill in the appropriate section(s) and forward.

W. B. Papageorge

/bt

Attachment

DSW 174549

STLCOPCB4049070

January 11, 1974

Dr. W. C. Hobson
Albany Medical College
International Center of
Environmental Safety
P. O. Box 1027
Holloman AFB, New Mexico 88330

Dear Dr. Hobson:

I have received your request for a sample of Aroclor® 1254 and am forwarding this sample to you under separate cover.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

A-1254 S/N 1803

DSW 174550

STLCOPCB4049071

January 10, 1974

Mr. J. F. Thompson
Quality Assurance Section
Chemistry Branch
Pesticide & Toxic Substances
Effects Laboratory
United States Environmental
Protection Agency
Research Triangle Park, N. C. 27711

Dear Mr. Thompson:

I have received your request for samples of Aroclor® 1221, Aroclor® 1242 and Aroclor® 1254 and am forwarding these samples to you under separate cover.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Aroclor 1221, 1242, 1254 } s/n 1802

DSW 174551

STLCOPCB4049072

W. B. Papageorge - General Offices, BIND

January 9, 1973

TOXICITY STUDIES

W. R. Corey - B2SL
S. R. Hinds - B2SB
G. J. Levinskas - A2SC
W. F. Symes - N1A
P. L. Wright - A2SC

Mr. R. S. Baker
B2SB

Attached is a summary of toxicity studies initiated during the fourth quarter of 1973 for the Special Chemical Systems Group.

W. B. Papageorge

/bt

Attachment

DSW 174552

STLCOPCB4049073

W. B. Papageorge - General Offices, B1ND

January 9, 1973

TOXICITY STUDIES

W. R. Corey - B2SL
A. J. Koenig - B2SK
G. J. Levinskas - A2SC
W. R. Richard - T3A
P. L. Wright - A2SC

Mr. H. S. Bergen

Attached is a summary of toxicity studies initiated during the fourth quarter of 1973 for the Specialty Products Group.

W. B. Papageorge

/bt

Attachment

DSW 174553

STLCOPCB4049074

January 9, 1974

Mr. James W. Hammond
Director, Industrial Hygiene
Medical Department
Exxon Company, U.S.A.
Post Office Box 2180
Houston, Texas 77001

Dear Mr. Hammond:

I have received your letter of December 19 requesting a Material Safety Data Sheet for Pydraul® 50E. Enclosed is a data sheet for this product.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure

DSW 174554

STLCOPCB4049075

January 9, 1974

Mr. Sanuel C. Laidley
McKesson Chemical Company
20575 Center Ridge Road
Rocky River, Ohio 44116

Dear Mr. Laidley:

Monsanto's Mr. E. Carter has informed me of your request for a Material Safety Data Sheet covering our Santocel products. I have enclosed a Data Sheet covering these products.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

cc: Mr. E. Carter
Akron

DSW 174555

32

STLCOPCB4049076

January 9, 1974

Mr. E. D. Sackett, Jr.
Scientific Instrument Division
American Optical Corporation
10 Optical Avenue
Keene, New Hampshire 03431

Dear Mr. Sackett:

Your letter of December 26 requesting a Material Safety Data Sheet for Aroclor® 4465 has been forwarded to me for response.

Because of environmental considerations, Monsanto has discontinued the manufacture and sale of this product, therefore, it would appear that a safety data sheet should not be required.

In the event you still have some of this material on your premises, I strongly recommend that you terminate the use of this material and dispose of any inventory in such a manner that will not result in contamination of the environment.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

DSW 174556

2/

STLCOPCB4049077

W. B. Papageorge - General Offices, B1ND

January 9, 1974 C. Paton - B2SC

SANTOSOL 220 - MATERIAL
SAFETY DATA SHEET

In Turn To:

J. F. Herber - T3G
J. T. Garrett - A2SA
W. B. Papageorge — B1ND

Attached is a draft of a Material Safety Data Sheet covering Santosol 220. Will each of you please fill in the appropriate section(s) and forward.

W. B. Papageorge

/bt

Attachment

DSW 174557

21

STLCOPCB4049078

Monsanto

OUTGOING MESSAGE BLANK
Tele-Communications System

DATE	TIME	SENDER'S ACCOUNT NO.
1/9/74	1:00	470000-735.40

INDICATE DESIRED SERVICE → ☐ FULL RATE ☐ DAY LETTER ☐ NIGHT LETTER

Names of addressee and sender must include initials. Show complete address for telegrams and cables.

H. A. VODDEN - LOUVAIN-LA-NEUVE

RE: YOUR MEMO DATED DECEMBER 19 RE DRAFT OF WORKING GROUP ON DISPOSAL OF TOXIC WASTES. DRAFT HAS BEEN REVIEWED. I HAVE NO COMMENTS TO OFFER.

W. B. PAPAGEORGE
ST. LOUIS, MO.

cc: R. A. Baxter - Brussels
J. N. Haggart - Brussels
S. Turover - Brussels

19

IN-IR [illegible] *for* BETTER *service* – Forward to transmitting operator IMMEDIATELY after preparation.

DSW 174558

STLCOPCB4049079

bcc: T. W. Oneson - 5090

January 8, 1974

Dr. Herman A. Ellenberger
Division of Clinical Chemistry
Pathology Institute
Department of Public Health
5788 University Avenue
Halifax, Nova Scotia
Canada

Dear Dr. Ellenberger:

As requested in your letter of December 20, 1973, I am enclosing copies of analytical methodologies for the analysis of polychlorinated biphenyls in air samples. One of these methods describes the procedures for converting a single compound by perchlorination. You mentioned in your letter that you do not have an electron capture detector. You will note that all of these methods I am sending you require a detector.

Responding to your question relating to the Fujiwara reaction, it is my personal opinion that the polychlorinated biphenyls are too stable and the results obtained will probably be inaccurate.

I am not personally familiar with the expression "chlorodiphenyl" but I suspect that it is used to apply to those materials more commonly referred to as polychlorinated biphenyls. I have enclosed a copy of one of Monsanto's technical bulletins and a copy of an article from THE ENCYCLOPEDIA OF CHEMICAL TECHNOLOGY. These two references should provide you with information on these materials.

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

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

E, O, T, DP

DSW 174559

18

STLCOPCB4049080

BCC: T. W. Oneson - 5090

January 8, 1974

Mr. T. A. Mejzner
Occupational Health Engineer
Department of Public Health
P. O. Box 488
Halifax, Nova Scotia
Canada

Dear Mr. Mejzner:

In response to your letter dated December 20, 1973 requesting information on our product Aroclor® 1016, I am enclosing the following information:

1. Analytical methodology for testing for the presence of this product in air and water.

2. A Material Safety Data Sheet

3. A copy of Monsanto's Technical Bulletin O/PL-306A

4. Composition of PCB Products.

5. Typical Properties of Aroclor 1016.

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

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosures

O, T
Typical % Composition
[illegible]

DSW 174560

STLCOPCB4049081

W. B. Papageorge - General Offices, E1ND

January 3, 1974

REGISTRATION OF
CHEMICALS -- JAPAN
T.I. Telex, 12/26/73

H. S. Bergen - E2SL
T. L. Gostage - E2SL
C. Paton - E2SC
J. R. Savage - E2SL
J. L. Wikoff - E2SL

Mr. D. Danna
E1SA

I have reviewed T. Ishijima's request with Howard Bergen. The following response should be forwarded.

1. OS-45 Type IV -- The tetra-alkyl silicate does fall in the tetra-alkyl/C8-13/silicate category found in the list. The remaining components are polyester acrylate and the commercial VI improver.

2. Santotrac -- This product is a cyclo-aliphatic hydrocarbon and also contains IV improvers such as polyacrylates.

3. Skydrol -- The stabilizer consists of aliphatic epoxides and di-epoxides.

W. B. Papageorge

/bt

DSW 174561

STLCOPCB4049082

January 7, 1974

Industrial Hygiene
Department 104340
Western Electric Company, Inc.
777 North Blue Parkway
Lee's Summit, Missouri 64063

Gentlemen:

In response to your Mr. Randle's letter of December 18 requesting a Material Safety Data Sheet for "HT-30 Polishing Slurry", I have enclosed a Material Safety Data Sheet covering Monsanto's Syton® HT-30.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure

DSW 174562

STLCOPCB4049083

January 7, 1974

Mr. R. J. Cunningham
Asst. Vice President
Zimmite Corporation
810 Sharon Drive
Cleveland, Ohio 44145

Dear Mr. Cunningham:

In response to your letter of December 17 requesting information relating to the hazardous and toxic nature of the products your company has purchased from Monsanto, I have enclosed Material Safety Data Sheets covering Monsanto's Dequest® 2000, Dequest® 2006, Dequest® 2010 and Dequest® 2054.

I note that you have also requested information relating to products purchased from our Detergents and Fine Chemicals Division and our Rubber and Process Chemicals Division. I have forwarded a copy of your letter to the appropriate individuals in these groups and you should be hearing from them shortly.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosures

bcc: P. O. DeGarmo
J. C. Weber

DSW 174563

STLCOPCB4049084

January 7, 1974

Mr. Grace Verrill
Boise Cascade Research
International Falls, Minn. 56649

Dear Mr. Verrill:

Enclosed is a copy of Monsanto's methodology for the determination of polychlorinated biphenyls as you requested. I hope you find it useful and informative.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosure

DSW 174564

STLCOPCB4049085

January 7, 1974

Dr. Richard Peterson
Pharmacology Department
Medical College of Wisconsin
561 North Fifteenth Street
Milwaukee, Wisconsin 53233

Dear Dr. Peterson:

Enclosed is the sample request form I promised to send you the other day. If you will return the completed form to me I will arrange to have the requested samples forwarded to you.

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Attachment

DSW 174565

STLCOPCB4049086

January 7, 1974

Mr. John Carter
Anatomy Department
Health Science Center
University of Texas
7703 Floyd Curl
San Antonio, Texas 78284

Dear Mr. Carter:

Enclosed is the sample request form I promised to send you. If you will return the completed form to me I will arrange to have a sample of Aroclor 1242 forwarded to you.

Following is the homolog composition of Aroclor 1242:

Homolog # Cl/Biphenyl	Aroclor 1242
0	<0.1
1	1
2	16
3	49
4	25
5	8
6	1
7	<0.1
8	ND

If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

DSW 174566

STLCOPCB4049087

W. B. Papageorge - General Offices, BlND

January 4, 1974

Messrs.

J. T. Bell - 1060
J. DiTommaso - 1410
J. E. Eldridge - 1150
L. E. Frank - 1560
R. A. Geisman - 1760
H. J. Horner - 1740
T. G. Lyons - 1890
E. C. Moredock - 1720
J. V. Robillard - 1900

Occasionally we receive requests for an explanation of the lot number designation of our finished products. I have attempted to get this information but find that no one at the General Offices has a clear understanding of the various systems in use.

Will you please send me a brief description of the method used to assign lot numbers to finished products shipped from your plants.

W. B. Papageorge

/bt

DSW 174567

STLCOPCB4049088

W. B. Papageorge - General Offices, B1ND

January 4, 1974

EPA's PCB EFFLUENT GUIDELINES

W. R. Corey - B2SL
K. W. Easley - 1920
R. E. Keller - T1B

Messrs.

H. S. Bergen - B2SL
P. B. Hodges - E1SF
D. B. Hosmer - E1SF
A. E. Leisy - 1740
C. Paton - B2SC
W. R. Richard - T3A
J. R. Savage - B2SL
J. F. Stapleton - A2SA
E. S. Tucker - T2F
E. P. Wheeler - A2SA

This is to inform you that there will be a meeting on Tuesday, January 8, at 2:00 PM in room B-303 to review the recently published proposed toxic pollutant standards.

A copy of the proposed standards and a summary are attached for your use.

Items to be discussed are as follows:

1. Filing of comments by January 18
2. Participation at public hearing to be held January 25.
3. Need for sampling programs at plant.
4. Letters to customers.

W. B. Papageorge

/bt

Attachments-2

DSW 174568

STLCOPCB4049089

W. B. Papageorge - General Offices, B1HD

January 4, 1974

KEAD - MCS 1551

Memo, CP dated 12/26/73

T. L. Gossage - B2SL
J. F. Herber - T3D
E. M. Potter - B2NK
W. R. Richard - T3A
J. R. Savage - B2SL

Dr. C. Paton
B2SC

I note from the reference memo that Kead has approved MCS 1551 for carbonless paper.

I have searched my files and could not find a completed EC-202 for the product. I recommend that the EC-202 evaluation be completed before this material is shipped to the customer on a commercial basis.

W. B. Papageorge

/bt

DSW 174569

STLCOPCB4049090

W. B. Papageorge - General Offices, E1ND

January 4, 1974

BONE ASH - CANADA

R. A. Herman - B2SJ
J. Rimmer - 5110
J. K. Stephens - B2NK
E. H. Toombs - 5090

Mr. R. L. Mulholland
A3SE

Attached is a copy of a letter from the Canadian Department of Agriculture addressed to Harold Toombs. This letter indicates that no restrictions will be imposed on the importation of Monsanto's Bone Ash into Canada.

Will you arrange to have a copy of this letter, as well as a Certificate of Origin, included with the export document on each shipment in the future.

A copy of this letter and a Certificate of Origin should be forwarded to the concerned broker to release the present shipment.

W. B. Papageorge

/bt

Attachment

DSW 174570

STLCOPCB4049091

W. B. Papageorge - General Offices, BlKD

January 2, 1974

J. T. Bell - 1060
H. S. Bergen - B2SL
W. R. Corey - B2SL
J. R. Savage - B2SL
J. F. Stapleton - B2SA

Dr. W. R. Richard
T3A

Attached is a copy of a letter from Dr. Gerald Gunning in which he asks if Monsanto plans to resume the fishery survey study which was temporarily discontinued in late 1972.

I recommend that Dr. Gunning be informed that we are not interested in resuming this study at this time.

W. B. Papageorge

/bt

Attachment

DSW 174571

STLCOPCB4049092

W. B. Papageorge - General Offices, B1ND

January 2, 1974

T. H. Bottini - B2CA
R. N. Perotti - E1NE
E. P. Wheeler - A2SA

EVCl HANDLING BULLETIN
IC/LB-9
Memo, WDL dated 11/26/73

Mr. W. D. Lubic
B1NB

I have reviewed the proposed EVCl bulk handling bulletin and suggest that a typical "toxicity and handling" statement be included.

W. B. Papageorge

/bt

DSW 174572

STLCOPCB4049093

W. B. Papageorge - General Offices, B1ND

January 2, 1974

M. H. Marcum - 1070
H. R. Ford - 1070

Dr. C. Paton
B2SC

I checked with Mr. Chet Otis, Manager, Environmental Affairs, Dow Chemical Company, Midland, Michigan, to determine if Dow had experienced any regulatory pressures relating to dye carriers and heat transfer fluids, specifically biphenyl.

Mr. Otis indicated that his company was not aware of any interest by any agency in those situations in which Dow products are involved. He offered, however, to check again and let me know if he found anything of interest.

W. B. Papageorge

/bt

DSW 174573

STLCOPCB4049094

W. B. Papageorge - General Offices, BLND

January 2, 1974

L. T. Johnson - 1650
D. L. Mellon - 1010
E. M. Potter - B2NK
W. R. Richard - T3A
W. H. Slowikowski - 1010

Dr. C. Paton
B2SC

Attached is correspondence from the Pollution Abatement Services Company mentioned in L. T. Johnson's call report relating to the November 28 call with Chevrolet, Massena, New York.

You will note in the New York State certificate, a copy of which is attached, that there is a severe limitation relating to halogenated hydrocarbons listed under item 5. I have discussed this with Mr. Jack Miller and he indicated that the state authorities are not enforcing this provision.

It is my personal opinion that this company is operating illegally when it incinerates materials such as PCBs and has been permitted to do so only because the authorities are not fully aware of the type of material being incinerated.

W. B. Papageorge

/bt

Attachments

DSW 174574

STLCOPCB4049095

January 2, 1974

Mr. Gerald Marconis
Vice President - Operations
Alsop Engineering Corporation
Milldale, Connecticut 06467

Dear Mr. Marconis:

I have enclosed copies of the information you requested in your letter dated December 6 and recent telephone conversation.

I hope this information is useful to you in establishing the source and presence of PCBs in your products.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosures

bcc: C. Paton - B2SC

E, O, T

DSW 174575

STLCOPCB4049096