Monsanto

FROM (NAME & LOCATION) R. M. Kountz - General Offices

DATE : September 22, 1969 cc: R. E. Howard

SUBJECT : Defense of Aroclor-Functional Fluids

REFERENCE :

TO : H. S. Bergen
Dr. W. R. Richard

As requested, my comments relating to rough draft from Dr. Richard to Elmer Wheeler are as follows:

General

The "General Policy" framework seems logical to me.

I am not as close to the Federal Agencies as some of you and accordingly I am not sure how active they are to determine where all this product can be found. Consequently, I disagree with the timing ~~indicated and stated~~. Studies should be in progress which would show our concern and cooperation, but I would not support an immediate restriction on uses. I am not aware that they have actually proven any points yet. Ultimate use restriction may be imposed.

Steps have been and are being taken to minimize losses from the plants, which again shows our concern and cooperation, but to "clean-up" our plants and eliminate all losses requires studies and evaluations to determine the most economical approach. Thus, I should think some TSD effort in conjunction with Research to develop the optimum process is in order. The optimum solution could then be recommended to our customers.

Less stable replacement products would be desirable and, if we don't find them, our competition will in some applications; however, this will be difficult or such products would already be available.

Gulf Coast

I fail to understand the suggestion for Fallon to purchase "all phosphate" ester from Food Machinery.

I fail to appreciate the benefit of replacing Aroclor 1254 with Aroclor 5442 unless I misunderstand the statement. A lower order of toxicity says to me that it is still toxic and the change has not eliminated the problem.

Working with customers to get them to clean up their plants should not be taken lightly. The approach must be tactful or

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customers will be scared off. Also, customers, like anyone else, are not about to spend money on pollution control until they are forced. Depending on the majority of needs, we may do well to have an engineering firm or Biodize prepared to assist a customer in need.

If, after some customer contacts, it becomes obvious that we will be getting returned material, I'm sure that arrangements can be made with Findett for disposal if we have a process.

Capacitor and Transformer Fluids

Again, plants will be cleaned-up when required.

I believe that we, at least, should be able to recommend clean-up techniques or refer customers to specific engineering firms or Biodize who can help develop appropriate clean-up systems when requested. I propose this latter approach.

It is not apparent to me that Monsanto will have an incineration system in the St. Louis area in the near future. Accordingly then, I suggest we pursue various disposal techniques with Findett for Aroclor waste. It is conceivable that some material can be restored to electrical grade quality; however, our present "know-how" should be guarded.

Monsanto Plants

Do we know that a Government contract can be obtained for adsorption and incineration studies? Is such a contract needed or wanted? Developments on a Government contract become public knowledge. Working independently or with private enterprise may be preferable.

Prior to going further in evaluating incinerators or other disposal techniques, some confirmation of whether or not we will be receiving waste Aroclor from customers is needed. A plant could be built and left on our hands to depreciate, or worse, one on which we would have to pay depreciation plus a reasonable ROI.

Chronic Toxicity and Biodegradation Studies

It is apparent that this work is necessary; however, it should be monitored and closely controlled. Such work could get so elaborate that it would be prohibitively expensive.

Here is where Aroclor 5442 can be tested prior to its substitution for Aroclor 1254 in hydraulic and compressor blends.

R. M. Kountz

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