Monsanto

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

February 13, 1985

Mr. J. J. Swallow
Plant Engineer
Foote Mineral Company
P.O. Box 527
Keokuk, IA 52632

Dear Mr. Swallow:

Prior to 1972 some Monsanto Pydraul® Hydraulic Fluids did contain polychlorinated biphenyls (PCBs).

Confirming our recent phone discussions and in response to your recent letter received January 14, 1985, I submit the following:

1. As I indicated over the phone, there was a product Pydraul® F-9 which contained about 52% PCB as Aroclor® 1248. I suggest your reference to Pydraul® F-8 is in error and suggest that you verify the product name. Monsanto has no product designated Pydraul® F-8. However, a review of our sales records shows no sale of Pydraul® F-9 to you during the period 1957 to the present.

2. Pydraul® 150 was a product that contained about 23% PCB as Aroclor® 1242. Our sales records show you purchased Pydraul® 150 during the period 1967 through 1970. You also purchased Pydraul® 150A (a polychlorinated terphenyl product) in the years 1971 and 1972.

3. Pydraul® 29ELT is a non-PCB hydraulic fluid product manufactured and sold as a replacement for prior PCB fluid formulations. Our records show you began purchasing Pydraul® 29ELT in 1972 as well as Pydraul® 50E (another non-PCB hydraulic fluid replacement product).

4. Many letters were sent to our Pydraul® customers during the period 1970-1973 alerting them of various issues involving the polychlorinated biphenyl content in some of the Pydraul® products. The attached document, dated August 3, 1973, is among those sent to Foote Mineral of Keokuk and other Pydraul® customers. This letter will set forth a good summary of the Pydraul® products containing chlorinated ingredients and the type of information we provided to our customers on safe handling, disposal and government compliance.

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If you believe that further discussion would be helpful, please call me at your convenience.

Sincerely,

John H. Craddock, Ph.D.
Product and Environmental
Safety Director

ve
Enclosure
bcc: T. M. Bistline
J. G. Nassif
W. J. McCarville

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