Monsanto

FROM (NAME & LOCATION) David Wood-St. Louis-B2SD

DATE : October 30, 1975 cc: f-EPA

SUBJECT : [redacted]-EPA

REFERENCE : COMMENTS ON EPA LETTER REC'D 10-17

TO : W. B. Papageorge
B2SK

1. Bill, this seems to be a new version.

2. Page 1. Cl. Terphenyls specifically mentioned.

3.a) Production records answer 1(a).
b) Remember we warehoused PCBs for short period 1974 ahead of labor contract renewal.
c) Question 1c raises a problem that has been at back of my mind. #2 report is supposed to show "ship to" address, but if this is case, why do 3rd party W/GE shipments appear under "bill to" locations.

4. Q2 a) No problem
b) No problem
c) No problem
d) No problem
e) Policy - Hanley level?

5. Q3-No problem except 71/72

6. Q4-No reclamation.

7. Q5-a) No problem
b) Difficult. Can split Dielec/HT/Pydraul
But some returns mixtures of oil/PCB, etc.
c) Can do.
d) Difficult
e) Difficult

8. Q6 - Available

DSW 319408

9. Q7 - a) Guess we have
b) Guess we have
c) Guess we have

10. Q8 - a) Bulk Rail
Bulk R - 3 accounts
Drum - Specify drum construction
b) E. M. Potter

IN - 10 REV 1/72

11. Q9 - Should answer from our activity?

12. Q10 - None? Yusho? Cloracne years ago - Dangerous Question.

13. Q11 - a) Might get HUB again?

b) Should write this one very carefully - can make some positive points in this section.

David Wood

/deb

DSW 319409

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 17 1975

OFFICE OF ENFORCEMENT

Monsanto Industrial Chemicals Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

OCT 22 1975

Gentlemen:

Recent governmental sampling data indicate the presence of Polychlorinated Biphenyls (PCBs) and comparable chemical substances in the air, in water bodies, and in fish in several areas of the country. In order to determine the nature and extent of the possible adverse effects resulting from the presence of PCB compounds in the environment, the Environmental Protection Agency (EPA), in cooperation with other federal and State agencies, is attempting to determine the sources and amounts of PCBs entering the environment. It is important that this effort be carried out without delay.

It is our understanding that your company handles PCB compounds or mixtures or comparable chemical substances in its operations. I am therefore requesting, pursuant to the authority provided by Section 308 of the Federal Water Pollution Control Act, as amended, 33 U.S.C. 1318, and Section 114 of the Clean Air Act, as amended, 42 U.S.C. 1857c-9, that your company furnish EPA with information pertaining to your use and handling of PCBs and comparable chemical substances. In addition to a general description, which should include information as to sources, quantities, uses, and ultimate disposition, you should respond in detail to the enclosed questions. If any question is not applicable to your company or operations, please so indicate by responding "not applicable."

The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. Should you so request, however, any information (other than effluent or emission data) which the Administrator of this Agency determines to constitute methods or processes entitled to protection as trade secrets will be maintained as confidential, pursuant to procedures specified in 40 CFR Part 2.

DSW 319410

STLCOPCB4055799

Within 14 days of receipt of this letter, your company must provide all information concerning your current status and activities and covering the twelve month period immediately preceding receipt of this letter.

Within 30 days following receipt of this letter, your company must provide all information for all of the prior years indicated.

The information required herein should be sent directly to the address indicated below. If you have any questions you may call the person indicated below or Mr. Blake A. Biles of our office at (202) 755-8731.

We appreciate your prompt cooperation in this matter.

Sincerely yours,

Stanley W. Legro
Assistant Administrator
for Enforcement

Enclosure

Regional Contact:
Mr. Earl J. Stephensbh
Director, Enforcement Division
Environmental Protection Agency
1735 Baltimore
Kansas City, Missouri 64108
Telephone: (816) 374-2576

DSW 319411

STLCOPCB4055800

POLYCHLORINATED BIPHENYL (PCB) COMPOUNDS OR MIXTURES

Within 14 days of receipt of this letter, your company must provide all information concerning your current status and activities and covering the twelve month period immediately preceding receipt of this letter.

Within 30 days following receipt of this letter, your company must provide all information for all of the prior years indicated.

FOR PURPOSES OF THIS LETTER, THE PHRASE "PCB COMPOUND OR MIXTURE" INCLUDES ALL CHEMICAL SUBSTANCES KNOWN OR BELIEVED BY YOU TO BE PCB COMPOUNDS OR MIXTURES OR OF A SIMILAR CHEMICAL NATURE, IRRESPECTIVE OF TRADE NAME, AND SPECIFICALLY INCLUDING CHLORINATED TERPHENYLS.

Different??

1. For each PCB compound or mixture produced or imported by your company, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:

   a. The total amount of each PCB compound or mixture produced or imported. ✓

   b. The name and address of each of your company's facilities which handle PCB compounds or mixtures (including production facilities and wholesale and retail outlets), and the amount of each PCB compound or mixture distributed through each facility.

   Sauget + WHSE (Strike period)

   c. The name and address of each customer of each PCB compound or mixture, the amount of each PCB compound or mixture obtained by each customer from each facility, and each customer's delivery point(s) for the receipt of each PCB compound or mixture.

   Can do Should we?

2. For each PCB compound or mixture incorporated by your company into its products, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:

   a. A description of each product.

   b. For each product the total amount incorporated of each PCB compound or mixture.

DSW 319412

2. (continued)

   c. For each product the name and address of each source from which your company obtained each PCB compound or mixture, and the amount of each PCB compound or mixture obtained from each source.

   d. The name and address of each of your company's facilities which handle such products (including production facilities and wholesale and retail outlets), and the amount of each product distributed through each facility.

   e. The name and address of each customer of each product, and the amount of each product obtained by each customer from each facility. For consumer products list only the total production of each product at each facility and the total number of customers. Do not provide the name and address of each customer of consumer products.

3. For each PCB compound or mixture used by your company in its operations other than for incorporation into its products, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:

   a. A description of each use.

   b. For each use the total amount of each PCB compound or mixture.

   c. For each use the name and address of each source from which your company obtained each PCB compound or mixture, and the amount of each PCB compound or mixture obtained from each source.

No problem

4. For each PCB compound or mixture reclaimed by your company, for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:

   a. A description of each method of reclamation.

   b. For each method of reclamation, the total amount of each PCB compound or mixture reclaimed.

   c. The total amount of each PCB compound or mixture reclaimed.

DSW 319413

d. The name and address of each source from which your company obtained PCB compounds or mixtures, and the amount of each PCB compound or mixture obtained from each source.

e. For each method of reclamation, the location of every reclamation site, the name and address of each party involved in the reclamation of each PCB compound or mixture, and the amount of each PCB compound or mixture reclaimed by each party.

5. For each PCB compound or mixture disposed of by your company (with or without the involvement of other parties), for each company facility, during each year of 1971, 1972, 1973, 1974, and the first two quarters of 1975:

Koenig Records

a. A description of each method of disposal.

b. For each method of disposal the total amount of each PCB compound or mixture disposed.

c. The total amount of each PCB compound or mixture disposed.

d. The name and address of each source from which your company obtained PCB compounds or mixtures, and the amount of each PCB compound or mixture obtained from each source.

Difficult X

e. For each method of disposal, the location of every disposal site, the name and address of each party involved in the disposal of each PCB compound or mixture, and the amount of each PCB compound or mixture disposed of by each party.

6. The composition by chemical name and percent by weight of each PCB compound or mixture produced, imported, sold, reclaimed, used, and/or disposed of by your company since January 1, 1971.

7. The results of any and all sampling and analysis performed by your company, its agents or contractors since January 1, 1971, concerning the following:

a. Concentrations of PCB compounds or mixtures in the effluent of any discharges by the company (into waters of the United States or Publicly Owned Treatment Works) or in the emissions of the company into the air.

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b. The flow and/or composition of any discharges or emissions by the company (into waters of the United States or Publicly Owned Treatment Works, or into the air) which contain PCB compounds or mixtures.

c. Concentrations of PCB compounds or mixtures in receiving waters (both upstream and downstream) of any discharges by the company which contain PCB compounds or mixtures and concentrations of PCB compounds or mixtures in the air in the area of the company.

8. The methods by which PCB compounds or mixtures are transported to, by, and/or from your company, including:

a. A description of each method of transportation, and the form in which PCB compounds or mixtures are transported by each method. Where different methods of transportation are used at different facilities specify which transportation method is used at each facility.

b. The names and addresses of all known transportors of PCB compounds or mixtures.

9. All occasions (including spills) of which you are aware on which PCB compounds or mixtures have or may have been introduced into the environment. In particular, describe such occasions insofar as they involved PCB compounds or mixtures in their liquid state, as incorporated into closed systems, or as incorporated into open systems. For each occasion, indicate name and address of party involved; dates, time, and location of the discharge or spill; and the amounts involved.

10. A description of any adverse health or environmental effects which you know or believe to have resulted from the introduction of PCB compounds or mixtures into the environment. Indicate any specific occasions including dates, times, locations, amounts, and parties involved for which such effects are known.

11. Any and all other information which you possess concerning:

a. The production, importation, reclamation, use, distribution, and disposal of PCB compounds or mixtures.

DSW 319415

b. The discharge of PCB compounds or mixtures into the environment.

In addition to the above, EPA would appreciate receiving any other information which you possess concerning the distribution and discharge of PCB compounds or mixtures by sources other than your company, including your company's customers and sources.

DSW 319416