

Monsanto

FROM (NAME & LOCATION): C. Paton - G. O.

DATE July 17, 1972

cc. P. W. Gann

SUBJECT FOOD-RELATED CUSTOMERS/PYDRAUL

REFERENCE

TO : J. H. Davidson
T. L. Gossage
H. S. Bergen
J. F. Stapleton
W. B. Papageorge
N. T. Johnson

Attached is a list of food-related customers who used PCB/PCT Pydrauls. Attached are four letters sent out in 1971-1972 to all Pydraul customers. You will note:

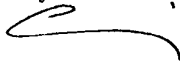
1. We did not identify all PCB-containing Pydrauls. (Pydrauls such as AC and F-9 used by food-related customers were not specifically mentioned in 2/1/71 letter)
2. On April 15, 1971 we stated "---no PCBs in any of our Pydraul fluids."
3. On February 28, 1972 we stated"---no draining--- is necessary. You need only to add the new products as make-up to your present systems."

We know that certain of the attached companies are concerned about PCBs in Pydraul (e.g. Ralston Purina and Pfizer). We also know that the proposed PDA regulation refers to lubricants. Further, we know from heat transfer experience that certain PCB-affected customers have tried to pin the cost of conversion and related problems on M.I.C.C. because of alleged failure to properly warn them on need for system clean-out, etc. Since we have not alerted food-related users of PCB Pydrauls in a special way like we did Therminol FR users, we may be leaving ourselves open to future claims or, worse yet, renewed publicity on PCBs a la fish meal incidents.

I would like you to consider sending the attached letter (modified as you may suggest) to the attached customer list. I propose Paul Gann to handle the mechanics of customer/product usage and mailing. Also, he should

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enlist field sales to identify (after the initial mailing) any customers we may have missed. I would propose we give some thought as to how we distribute this letter to the customers. We have learned a few things about customer relations in the blizzard of mail we've sent out in the past few years.



C. Paton

/pep

Suspect Pydraul Applications - From IBM Run

American Can	Washington, New Jersey, Modesto, California	
Anheuser Busch	4 locations	
Continental Can	7 locations	
Northern Packaging	Rochester, New York	
Petroleum Distributors	Houston, Texas	Should look at their customer list
Ralston Purina	15 locations	
Upjohn Company	New Haven, Connecticut	
Cherry Burrell	Cedar Rapids, Iowa	In process of changing to Pydraul 30 E - milk carton sealing machine manufacturer
Associated Milk Products	Rochester, Minnesota	
Borden	Illioopolis, Illinois	
Glass Container	Los Angeles, California	AC-A, blowing glass bottles
Hunt Wesson	Chicago, Illinois	
Owens Illinois	9 locations	AC A, blowing glass bottles
Pevely Dairy	St. Louis	
Pfizer	Terre Haute, Indiana	
Proctor & Gamble	11 locations	
Thatcher Glass	2 locations	AC, blowing glass bottles

Catalina Divers	Avalon, California	)	
Dive Shop	Bay Shore, New York	)	AC-A filling scuba
Scuba Hut	Springdale, Arkansas	)	divers tanks
Divers Equipment	Kansas City, Missouri	)	
Cliquot Club	Millis, Ma.	)	
CIBA Pharmaceutical	Somerset, New Jersey		
Custom Bevocan	Charlotte, N. C.		
Seven Up	Detroit, Michigan		
Countrys Delight Milk	Chicago, Illinois		Cherry Burrell carton
			sealer changed to
			Pydraul 30 E
Hawthorne Melody Farms	Chicago Illinois		
Tuscon Dairy	Union New Jersey		
Total Customers Listed Above:			28
Customers with Air Compressor Applications :			14 (pneumatic equipmer
All others:			14
Total Pydraul Customers :			approximately 1000

Monsanto

ORGANIC CHEMICALS DIVISION

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 894-1000

February 1, 1971

Dear Sir:

In February, 1970, we advised you of the newspaper and magazine articles indicating that polychlorinated biphenyls (PCBs) have been discovered at some points in some marine, aquatic and wildlife environments. It was claimed that the PCBs found strongly resembled chlorinated biphenyls containing 54% and 60% chlorine by weight. The quantities detected are said to be in the parts per million and parts per billion categories.

Pydraul 312, Pydraul 135, Pydraul 230, Pydraul 540-A and Pydraul A-200 have been formulated with polychlorinated biphenyl. New formulations have been developed and tested to provide equal or superior performance. The new formulations will be designated Pydraul 312 A, Pydraul 135 A, Pydraul 230-A, Pydraul 540 B and Pydraul A-200-B. They are completely compatible with the old formulations and do not contain polychlorinated biphenyls.

During the next 60 days, as inventory is depleted in warehouses around the country, the new formulations will be shipped to fill your orders.

If we can be of further assistance or answer any questions you might have please contact your local representative or me in St. Louis.

Very truly yours,

C. L. Bradford

C. L. Bradford
Product Manager

lb

MONS 098549

Monsanto

ORGANIC CHEMICALS DIVISION

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 684-1000

April 15, 1971

Dear Sir:

Over the past year or so we have written you several letters concerning polychlorinated biphenyls and have urged that care be taken to prevent the escape of hydraulic fluids containing PCBs into the environment. Certain Pydraul hydraulic fluids did contain PCBs, taking advantage of the excellent characteristics of that material for certain industrial applications. However, in view of the questions which have been raised concerning possible environmental effects, Monsanto launched a program to develop alternative products without using PCBs.

This is to inform you that our efforts to develop alternative hydraulic fluids for applications which cannot be completely confined have been successful. There are now no PCBs in any of our Pydraul fluids.

We appreciate your understanding over this past year. The reformulated products you are now using will give you equal or better performance than you previously had - and with no PCBs.

Very truly yours,

C. Larry Bradford

C. Larry Bradford
Product Manager
Hydraulics & Lubricants

P. S. - Would you please circulate this letter to all departments in your operation that are concerned with hydraulic fluids and/or maintaining a clean environment.

MONS 098550

Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63168
Phone: (314) 894-1000

January 31, 1972

Dear Sir:

We are writing to tell you that effective June 30, 1972, all Pydraul fluids will be a new formulation. We have decided to stop using polychlorinated terphenyls as a component in our fluids. Our new fluids will contain no chlorinated components.

In order to make a smooth transition to the new Pydraul fluids, we will continue to manufacture fluids with the current formulation until early in the second quarter of 1972. At that time we will begin phasing in the new formulations and phasing out the old. We expect to complete this transition well before June 30, 1972.

In the meantime we will make every effort to contact each of you, our customers, individually. We would like to work out with you the details of this transition so that it best satisfies your needs.

Yours very truly,



Howard Bergen, Director
Specialty Products Group
Monsanto Industrial Chemicals Company

lb

MONS 098551

Monsanto

ORGANIC CHEMICALS DIVISION

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63108
Phone: (314) 894-1000

February 28, 1972

Dear Sir:

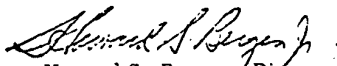
In early February, we notified you that the Pydraul Fluids were being reformulated to remove all chlorinated components. The new Pydraul fluids will become available after April 1, 1972, and we will be phasing in the new products during April and May.

The new Pydraul products will be compatible with the present formulations and no draining, cleaning or changing of seals in your systems is necessary. You need only to add the new products as make-up to your present systems.

Each of the new Pydraul fluids has been listed by Factory Mutual as an approved less hazardous hydraulic fluid.

We will be writing again in mid-March to keep you thoroughly informed and abreast of our plans. Should you have questions, please feel free to contact the Pydraul Fluids Specialist in your area.

Yours very truly,



Howard S. Bergen, Director
Specialty Products Group
Monsanto Industrial Chemicals Company

lb

MONS 098552

July 17, 1972

Dear Sir:

In February, 1971 we announced the reformulation of certain Pydraul[®] fluids to eliminate the use of PCBs (polychlorinated biphenyls) as components of the fluids. Since then we have gone even further and eliminated the use of any chlorinated compounds in our Pydraul fluids. Effective July 1, 1972 no Pydraul fluids will be sold that contain chlorinated compounds as a formulation component.

Our action on PCBs has been supported by the publication on May 14, 1972 of the Inter-governmental Agency PCB Task Force Report (COM-72-10419) which recommends the discontinuation of PCBs for all uses except as dielectrics in capacitors and transformers.

On March 18, 1972 the FDA issued in the Federal Register (Vol. 37, No. 54, pp. 5705-5707) a notice of proposed rule making on PCBs with respect to food, food processing, animal feeds and food packaging. The FDA is proposing that temporary tolerances be set for a variety of foodstuffs and food packaging ranging from 0.1 to 5.0 parts per million PCBs.

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Furthermore, the FDA proposes the prohibition of PCBs in systems related to the processing of food, animal feed or food packaging.

In view of the foregoing governmental actions you may wish to evaluate their effects, if any, in light of past purchases of PCB-containing fluids from Monsanto. To assist you in carrying out any investigations you may care to make, we have attached a list of Pydraul purchases by your company each year from 1969 to the present. We have also attached a list identifying all our Pydraul fluids as PCB or non-PCB containing products.

Should you desire to properly dispose of any Pydraul fluids, Monsanto has established a high temperature incinerator facility at Sauget, Illinois. Details of how to avail yourselves of this service are also attached. In light of society's present concern with environmental pollution, high temperature incineration is the best method of properly disposing of waste organic liquids of any kind.

If you have any-further questions, please do not hesitate to contact us.

Very truly yours,

MONS 098554

PYDRAUL FLUIDS

PCB-Containing
Pydraul Fluids

Pydraul 150
Pydraul AC-Wintergrade
Pydraul A-200
Pydraul F-9
Pydraul AC
Pydraul 625
Pydraul 135
Pydraul 230
Pydraul 312
Pydraul 540A

PCT*-Containing
Pydraul Fluids

Pydraul 150A
Pydraul AC-A Wintergrade
Pydraul A-200B
Pydraul F-9-A
Pydraul AC-A
Pydraul 625A
Pydraul 135A
Pydraul 230A
Pydraul 312A
Pydraul 540B

Present Pydraul
Fluids (No Chlorinated
Components)

Pydraul 10E (Pydr. 60)
Pydraul 29E LT
Pydraul 30E
Pydraul 50E
Pydraul 50E
Pydraul 90E
Pydraul 115E
Pydraul 230C
Pydraul 230C
Pydraul 312C
Pydraul 540C