

Monsanto

FROM : J. H. Craddock - St. Louis G3WA 4-4764
(NAME-LOCATION-PHONE)

DATE : September 3, 1980
SUBJECT : AUGUST MONTHLY REPORT
REFERENCE :
TO : R. S. Nelson - G3WA

cc. D. R. Bishop - A3NB
C. F. Callis - B3CA
A. M. Ford - G3WA
J. N. McGuire - G3WA
J. R. G. Ortiz - E2ND
J. H. Waldbeser - G3WA

PCB SURVEILLANCE PROGRAM

Detoxification of PCB's - Goodyear Process

Goodyear Tire and Rubber unveiled to the public a new process for detoxifying PCB's and offered to dedicate patents if any are granted to the public domain.

The announcement received broad news wire, press, TV and radio coverage and stirred considerable interest nationwide. This office received about two dozen calls regarding the Goodyear disclosure and its applicability.

The reaction employs a sodium naphthalide reagent in an ether (tetrahydrofuran) solvent at ambient temperature and pressure, reportedly converting the PCB's to table salt, sodium chloride and non-halogenated hydrocarbon polymers.

The Monsanto position as relayed to the media is that we are aware of the Goodyear Process and have seen an advance copy of the technical paper. Monsanto technical staff visited the Goodyear Research Center earlier this year to discuss the paper. We are "cautiously optimistic" that this new process will safely function to remove PCB's in the environment. It's certainly a step in the right direction. The Goodyear Process should have applicability in several situations, although it is not a panacea to solve the PCB disposal problem.

There are still many unanswered questions that have to be researched, i.e.,

Will it work on highly concentrated PCB's?
>1%, 10%, 50% or 100%?

What other kinds of PCB contaminated fluids other than hydrocarbon oils can use this technique? (Systems contaminated with water, esters including organophosphate (Pydrauls) may be a problem or too costly due to consumption of reagents.)

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What are the organic reaction products? Their toxicity, etc.? (Are any higher chlorophenyl polymers formed, e.g., chloroquaterphenyls via coupling?)

It will take time and more R&D to fully evaluate the significance and general applicability of this new technology.

MSDS - Draft Review Completed and approved

The new Material Safety Data Sheet (MSDS) for PCB's was reviewed and approved by DMEH, Legal, S&PP and operating company units. A preview of the final PCB MSDS will be provided to management and Monsanto units needing this information prior to issuance later this month. We currently have 12-15 requests on file for the PCB MSDS when available.

Monsanto Container Standards - Packaging Guidelines for PCB Drums

A proposed amendment to the Monsanto Corporate Distribution Department Standard VIII-A-1 of the Sample Packaging Guidelines was developed by CDD and recommended by this office. The amended standard is circulating for review and will become effective in mid-September.

This change will comply in all aspects with the Final PCB Disposal/Storage Regulations (40 CFR 742 (c) (6) and will be responsive to plant requests by making the internal Monsanto standard essentially equivalent to that of the federal regulations.

The old Monsanto standard was more stringent than the regulations and required use of drums not readily accessible to all plants which were more costly if and when available.

ECC Presentation - PCB Plant Concerns - Issues and Recommendations

A presentation on PCB plant concerns was made to the ECC at the August meeting. Several issues and concerns regarding PCB's at Monsanto plant sites were identified and recommendations were made. Feedback was requested from the ECC and operating company representatives:

Issues/Concerns/Recommendations

1. Develop and implement a standard Monsanto procedure/format and central location for the annual recording and

monitoring of PCB's at plant sites. (This document is required by regulation July 1 of each year.)

2. Complete and issue Corporate guidelines for PCB Spill Prevention Control and Countermeasure and Regulation Guidelines for "hands on" use in plants.
3. Provide plant environmental staff (via DEO's) copies of EPA TSCA Inspection Guidelines for PCB use, storage, marking, disposal and recordkeeping regulation. Assist in informal audits/reviews of site facilities.
4. Explore establishment of uniform Monsanto practices/facilities for PCB storage, disposal:
 - a. Storage facilities per se - centralized locations
 - b. Monsanto standards vs. regulatory standards
 - c. Coordinate contractor services:
 - (1) Contracts/shipments/rates to landfills
 - (2) Contracts/shipments/rates to incinerators
 - (3) Transformer service companies
 - d. Strongly "urge" sites to dispose of any material that can legally, safely be done under present regulations (e.g., landfill capacitors, drained transformers, liquid PCB's 50-500 ppm range).
5. Develop and publicize guidance for PCB equipment replacement policies:
 - a. Normal vs. accelerated replacement (e.g., FDA regulated sites, all sites)
 - b. New capital projects
6. Develop system for coordination of PCB issues at plant level:
 - a. What issues/recommendations?
 - b. Who? How? (Via DEO's, ECC, plant contacts?)
 - c. How much information? How frequently?

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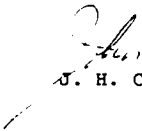
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Responses - Phone/Letter Inquiries

Responses this month approached 100 despite the fact that two weeks vacation occurred. The high point occurred the week of August 18 following the Goodyear announcement.


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