

Monsanto

FROM (NAME & LOCATION): W. R. Richard - Research Center

DATE: September 9, 1969

cc: P. Hodges. PHODG
M. Farrar Res. 1
H. Bergen HBERG

SUBJECT: DEFENSE OF AROCLOR -
F. FLUIDS

TO: E. Wheeler - EWHEE

General Policy

✓ Make the Govt., States and Universities prove their case, but avoid as much confrontation as possible. Comply and work with public officials to meet or exceed requirements ahead of time. Adverse publicity and competition are the real weapons.

Analytical { In Air - Which Aroclors are present? Where?
for Aroclor { In Water - Which compounds?
In Animals - interfere? }

Keep track of how much contamination - which sources.
Prove Bioharmful - Let Govt. prove its case, on case by case

Monsanto Visit - Govt. Biolabs - in search of toxicological experiments and evidence vs. Aroclors to keep up progress.

Monsanto Prove Bioharmless - Limited work at Ind. Bio-test -

"Safe" toxic level for	{ man mammals fish	via	<u>Rats</u> <u>Chickens</u> <u>Fish</u>	Seek evidence of Bi d Question evidence a u Question shrimp toxic especially other chemicals. If Aroclor bad, other must be worse.
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Probable Outcome

We can prove some things are OK at low concentration.
Give Monsanto some defense.

We can't defend vs. everything. Some animals or fish or insects will be harmed.

Aroclor degradation rate will be slow. Tough to defend against. Higher chlorination compounds will be worse than lower chlorine compounds.

Therefore we will have to restrict uses and clean-up as much as we can, starting immediately. A

↑ to what level?

Which one?

PLAINTIFF'S
EXHIBIT

424

PLAINTIFF'S
EXHIBIT

4575

Therefore we will have to work for alternate products in end use applications; for Aroclor production facilities.

Clean Up Aroclors and substitute products where necessary and when required, before threats of publicity and competitive activity overwhelm us.

Water Pollution seems to be first issue

Aroclor product is refractive, will settle out on solids - sewerage sludge - river bottoms, and apparently has a long life.

Florida or Gulf Coast - Aroclor 1254 - Aroclor 1260 pres issue.

40-200 ppb - causing problem at Pensacola (Monsanto) in plant effluent-causing " with shrimp.
- can't risk shut-down of plant.

Federal and State can extrapolate to other plants in Gulf area.

San Francisco - Aroclor 1254 and 1260

Reported Aroclor to be present in San Francisco Bay.

Reported to be thin egg shells in birds -

Lot of screaming -

Great Lakes

Warf studies on DDT

Aroclor 1254 will be found!

Aroclor 1242 will be found?

Air Pollution - Possible spread - but less of an issue right now.
Analytical work more difficult.

Direct Contact with Product

Doesn't seem to be an issue - except for food heat transfer:

We don't believe Aroclor is being used as carrier for insecticide - sprayed around -

We are not positive but most uses are "closed" systems or products used in solid plastics, or adhesives, or sealants.

F. Fluids

Possible Pollution by Customers Plant Operation Possible by Customers

Product

Hydraulic Fluids	Yes, leakage external	Possible - Johnson Mot Castings.
Air Compressor Fluids	Yes, leakage external	Leakage int
Heat Transfer	Yes, leakage external	Leakage int
Capacitor Fluids	Yes, leakage from plant - Scrap materials.	In product closed for
Transformer Fluids	No, Should be clean. Yes, Reworked transformers	In product closed for

* Capacitors can go to land fill dumps. Probably not burned, in Al containers.

** Need to take care of Aroclor in discarded transformers. Product could be drained and reworked.

Probable Conclusions

Hydraulic Leakage

- Product could be caught at machines but will take a lot of clean-up work with customers. - Will have to have replacement product - with less-sensitive components. Work from this base on clean-up to prevent more pollution problems.

Air Compressor Fluids

Hydraulic Fluids

Must expect "shrimp" experiments, West Florida State, to be "aired" sometime soon; next few months.

This will lead to bad publicity and competitive action vs. all Hydrauls.

We will have to try to confine to Aroclor 1254 and Aroclor 1260.

We will have to take action before that time.

Gulf Coast -

Action Be able to replace Aroclor 1254 and Aroclor 1260 in Pydraul AC and 625 in 2 month's time before Nov. 15, 1969.

W. Richard

Fallon/Richard Have trial product in hands of Gulf Coast accounts and distributor before Dec. 15.

7, 1 Fallon Suggest possible buy of "all phosphate" ester from Food Machinery. Use this as one trial fluid MCS___ for insurance.

Richard/ Suggest possible substitution of Aroclor 5442 for Aroclor 1254 in hydraulic and compressor blends. E. Wheeler judges lower order of toxicity and solubility for 5442 series. Have to test product in pump test for deposits.

Fallon/Richard Suggest field trials of our own all-phosphate ester.

Fallon/Kuhn/Kountz Work with large customers to clean-up streams. Bring in Findett as mfg. partner in the recycle business. Get money out of recycle operations.

Inland-Waterways-

Wheeler/Richard Be close enough to Great Lakes studies to judge situation. Are there animals which are being affected by the concentrations found?

7, Richard Be prepared to replace Aroclor 1254 and Aroclor 1260 in 4 months in hydraulic fluids and in air compressor fluids.

Richard Be prepared to replace all Aroclor 1242 or 1248 in 6 months in hydraulic fluids. This means replacement of Pydraul 312 series, and control of sale of Aroclor 1248 to other hydraulic accounts such as Cities Service and Mobil.

Heat Transfer

Fallon/Roush/Kountz Systems will have some leakage depending strongly on engineering and maintenance. Need to work with customers on clean-up.

Fallon/Roush Need to replace FR especially in food or sensitive product areas where the product is getting into water. See dish washer compounds. See letter E. Wheeler to J. Fallon.

We have possible replacement products in Thermint 55.

MON 0212

Thermint 65.

Action

Kuhn

Try to assure adequate production of Therminol 66 in face of decreased Aroclor production. H₂ and terphenyl supply may become short.

Switch customers to Therminol 55
or Therminol 66
ahead of pollution problems in customers plant.

Work with customers on plant and dumping practices.

Kuhn/
Fallon

Findett already set up to rework. Need to make them a manufacturing arm. We get sale of recycle-rework fluid.

Capacitor
Fluids

Capacitor plants have re-purification and recycle systems but up to 5% of product can be lost by poor plant producers and off-quality material.

Capacitor products

Enclosed in Al or stainless steel for 5 to 25 year period.

Mkt. Benignus/
Bryant

Will ultimately have to dispose of capacitor products.

Eng.-Kountz/
Mfg-Hodges

5% of production could be 1M lbs/year. This is a big loss for the type of pollution we are trying now to guard against.

Recommend we try to save this product for a time.

Action

Eng., TSD-
Plant Pol-
lution Con-
trol

Monsanto must start to work with capacitor people to clean up plant practices. We have set-up to accept material for rework into hydraulic fluid but this relocation is not a satisfactory solution. Material must be reworked to electrical grade or destroyed, whichever is more economical. Must start now to get control of off-grade material.

Recommend replacement future Aroclor business with other products. Have 2 years.

Hodges/
Kountz

Action

Monsanto must help plant clean-up of customer plants decantation, coalescing, adsorption, disposal of adsorbent or recycle of adsorbents. Monsanto badly needs "know-how" for clean-up.

Monsanto should seek Govt. contract money for clean-up research, (See MRC R. Binning, D. Nelson)

Transformers

Transformer Plant can operate in a clean, efficient manner with recycle of off-grade Aroclor.

Product transform can remain close no exposure for

Action

Benignus/
Bryant

Should advise disposal of filter element materials so as to minimize chance of water pollution. Incinerate or dispose.

Reworked transformers pose a threat if the Aroclor is dumped into a water stream.

Should try to re business by clear by education of tomers.

Action

Benignus/
Bryant

Should try to minimize chance of dumping "old" fluid by reworking and by educating co. shops and collecting product for rework or disposal.

Dalton is set up in England to rework electrical grade fluid.

Kuhn/Kountz
Findett?

Need rework facility here + disposal scheme.

Monsanto Plants

The Dept. of Interior and/or State authorities could monitor plant outfall and find ppm of chlorinated biphenyls at Krummrich or Anniston anytime they choose to do so. This would shut us down depending on what plants or animals they choose to find harmed.

Action - Take steps to see that every precaution is taken to prevent Aroclor entering water streams. Try to reduce to ppb level.

P.Hodges - Seek a Govt. contract on adsorption and incineration cycles - MRC.

TSD

Enrgg.-

Kountz

Take samples of streams and river water and mud evidence for before and after clean-up. Samples can be stored for further analysis if we can't keep up current with analytical determinations.

Apply Monsanto clean-up methods to customer plant clean up equipment and procedures.

Action -
Engrg. &
Mfg.
Kountz
and
Kuhn

Evaluate liquid incinerators vs. solids handling incinerators for disposing of Aroclor and pentachlorophenol wastes. I estimate Aroclor disposal at 1-4M lbs/year, exclusive of cleaning up river bottoms or outfall bottoms.

Hydraulics	20% of 4M lbs	800,000 lbs
Heat Transfer	10% of 2M lbs	200,000 lbs
Capacitors	5% of 20M	1,000,000 lbs
Transformers	5% of 15M	750,000 lbs
		2,750,000 lbs

Central
Eng. &
Mfg TSD

Set up an incinerator to handle Aroclor disposal - preferably one which will handle solids such as muds - slurries as well as liquids. Have in operation within 12 months. Ideally have incinerators available different sections for disposal.

Kountz &
Kuhn

Possible
help from
MRC

Chronic Toxicity Studies - Ind. Bio-Test

Wheeler
Keller
Ind.Bio-
Test

Continue studies to establish FDA type limits of toxicity on Aroclor 1242, Aroclor 1254 and Aroclor 1260.

Rework with R. Keller-S. Tucker the number of samples which are to be analyzed for Aroclor in tissue. Try to see if Aroclors are changed metabolically. Does concentration level off, decline if feeding is stopped?

Institute studies against the most limiting biological parameters. If shrimp are the most limiting species for Aroclor levels of toxicity, then we will have to have biological studies on these species to confirm or deny adverse findings.

Biodegradation Studies

Set up rate of biodegradation studies with Inorganic Div.
on Aroclor 1242 vs. Aroclor 1254
Aroclor 5442 vs. Aroclor 5460
Swisher Chlorinated diphenyl ether
Chlorinated paraffin vs. chlorinated naphthalene
Chlorobromo Aroclors 1242 and 1248

Baxter Contact Baxter and Lidgett at MCL regularly for results on
Lidgett Aroclor degradation. They are reported to be moving on
MCL laboratory experiments.

Establish contact with chlorophenol degradation studies
of Cellu-Chem Group.

WRR

W. R. Richard

WRR:ms