

H. S. BERGEN - ST. LOUIS

SEPTEMBER 12, 1969

DEFENSE OF ARECLOR -
FUNCTIONAL FLUIDS

R. M. KOUMTZ
~~W. A. KUHN~~
D. A. OLSON

Please find attached a rough draft from Dr. Richard
to Elmer Wheeler regarding Areclor toxicity.

I would appreciate your comments to both Dr. Richard
and myself regarding this draft.

H. S. BERGEN

DS



DSW 014254

HARTOLDMON0015061

WILLIAM RICHARD

9/9/50

Dear,

I promised a draft for
committee review before

I left on vacation. Please
consider this only a 1st draft of
what might be done.

Thanks,

Bill Richard

DSW 014255

HARTOLDMON0015062

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

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

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.

Keep track of how much contamination - which sources.

Prove Bioharmful - Let Govt. prove its case, on case by case basis.

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

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

"Safe" toxic level for	{	man	via	Rats	Seek evidence of Biodegra-
		mammals		<u>Chickens</u>	
		fish		<u>Fish</u>	Question evidence against us.
					Question shrimp toxicology especially other toxic chemicals.
					If Aroclor bad, others must be worse.

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.

hydrochlor degradation rate will be slow. Tough to defer.
 Against. Higher chlorination compounds will be worse.
 Lower chlorine compounds.

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

DSW 014256

100-100000

100-100000 W. R. Richard - Research Center

DATE September 9, 1969
SUBJECT DEFENSE OF AROCLOR -
P. HODGES
REFERENCE
TO E. Wheeler - EWHEE

P. Hodges PHODG
M. Farrer Res. 1
H. Bergen HBERG

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 For Aroclor { In Air - Which Aroclors are present? Where?
In Water - Which compounds?
In Animals - interfere? } Govt. Agencies

Keep track of how much contamination - which sources.

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"Safe" toxic level for { man mammals via Rats Chickens Fish } Seek evidence of Biodegradation
Question evidence against us.
Question shrimp toxicology especially other toxic chemicals.
If Aroclor bad, others must be worse.

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.

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PLAINTIFF'S
EXHIBIT

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HARTOLDMON0015064

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 over-whelm 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 present 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.

DSW 014257

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<u>F. Fluids</u>	<u>Possible Pollution by Customers Plant Operation</u>	<u>Possible Pollution by Customers Product</u>
Product		
Hydraulic Fluids	Yes, leakage external	Possible - See Johnson Motors Castings.
Air Compressor Fluids	Yes, leakage external	Leakage into product
Heat Transfer	Yes, leakage external	Leakage into product
Capacitor Fluids	Yes, leakage from plant - Scrap materials.	In product but closed for end use*
Transformer Fluids	No, Should be clean. Yes, Reworked transformers	In product but closed for end use*

* 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 Pydrauls.

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

OSW 014258

We will have to take action before that time.

Gulf Coast -

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

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

7 | Fallon Suggest possible buy of "all phosphate" ester
1 | 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/ Suggest field trials of our own all-phosphate
Richard ester.

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

Inland-Waterways-

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

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.

DSW 014259

Heat Transfer

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

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

We have possible replacement products in Thermin 55.
Thermin 66.

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

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.

Will ultimately have to dispose of capacitor products.

Eng. Kountz/
Mfg-Hodges

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 of 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)

DSW 014260

Transformers

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

Product transformers can remain closed and no exposure for 25 yrs

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 retain business by clean-up; by education of customers.

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.

in progress
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
Engrg.-

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.

DSW 014261

Action -
 Eng'g. &
 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
 Kountz &
 Kuhn

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.

*see will
 be high*

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.

OSW 014262

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

OSW 014263