Monsanto

FROM W. H. Slowikowski - B2SD

PCB file

DATE May 6, 1976

SUBJECT RECENT EPA (PCB) LETTERS TO PYDRAUL, THERMINOL CUSTOMERS

DEPARTMENT

TO
R. S. Bevacqua - 1550
C. L. Clay - 1070
G. F. Fague - 1550
A. A. Johnson - 1010
J. C. Larkin - G4NN
D. L. Mellon - 1010
J. S. Pullman - 1010
J. J. Roder - G4NN
K. S. Rosenberg - 1460
C. F. Seger - 1010
J. E. Spinks - 1010

cc
D. R. Bishop - B1NB
T. H. Bottini - B2CA
R. L. Koch - B2SD
M. E. Marshall - B2SD
C. Paton - B2SK
R. G. Pier - B2SK
R. G. Potter - B2SB
D. L. Sliney - B2SB
J. C. Weber - B2SB

The Federal Environmental Pollution Agency is in the process of identifying and quantifying possible sources of PCBs entering the environment. This program is part of an overall plan to assess the nature and the extent of possible adverse effects resulting from the presence of PCB compounds in the environment. We obviously have information which could aid this program. Monsanto, in fact, was directed by the Federal Environmental Pollution Agency to supply a listing of all past purchasers of PCB containing materials as well as amounts purchased. The EPA also has a list of PCB containing products and the percent by weight of PCBs in each product. (See attached.)

We now have been informed that all customers who used PCB containing Therminol® and Pydraul® fluids since 1971 (other than those contained in sealed systems, such as transformers and capacitors, obtained in finished form from another facility and used without breaking the seal) may receive a letter from the EPA asking the customer to provide detailed information with respect to the facilities which used PCBs, tradename of the PCB product used, percent by weight and amount of each PCB compound used, sold, discarded, reclaimed, etc., etc. Some customers have already received these letters. (This ought to be a small list since Therminol discontinued on 12/15/71 and Pydraul PCTs in June of 1972.) However, this has led to a plethora of requests to MIC for information and assistance in responding to the EPA.

The Product Group will continue to relay all such inquiries to the appropriate salesmen. The salesmen are requested to adhere to the following guidelines when contacted by their customers:

- The EPA letters have been addressed to specific accounts and include the amount of PCB (in pounds) as well as the PCB containing products used by that account. Therefore, the data contained in these letters are as accurate as any we could provide. The information contained in these letters was no doubt generated from the reports extracted from Monsanto. If the customer requires more information, he should request this information from the EPA.

- With respect to verifying usage, locations, disposal, etc., the customer should check his own records. It is the customer being asked to account for the use of this product and not Monsanto. We have already done so. If the customer hasn't any records, then he should consult with his own environmental engineering department and/or the local EPA office for direction. It is no offense, as far as we understand it, to tell EPA that they did not maintain records of PCB-containing products.

- The letter asks for results of any sampling the customer may have done to measure PCBs in air or waste-water discharge streams. With respect to this, it's important that our policy on PCB sampling is adhered to. Since late 1971 Monsanto has referred customers requiring PCB sampling analysis to laboratories who claim competence in this area. Monsanto does not undertake this service. Laboratory lists were furnished in SIB #60 (11-19-71) and SIB #193 (10-7-75). (Copies of both these SIBs are attached.) In actual fact, the credibility of PCB figures provided by Monsanto for its customers could easily be suspect. Also, given our position as the sole U.S. source of PCBs, it is conceivable that we could be obligated to inform the EPA of any knowledge of PCBs in the environment. Should this occur, it would be necessary to reveal the information we had as a result of analyzing customer samples for PCBs. Independent laboratories therefore must be consulted.

- If asked what Monsanto recommends in terms of future action on the part of the customer, please remind him that there has been a variety of regulations (federal, state and local) concerning PCBs and PCTs, both passed into law and being discussed for future laws. PCB legislation takes a different form in each state. Monsanto has no expertise in this area as the action to be taken depends upon the specific circumstances involved with the customer's use of the PCB products, location, and plant operations. The customer's own environmental engineering office, the local EPA office, and outside consulting firms can provide much more detailed information on this matter. As a point for discussion, one consulting firm has recommended that "if PCBs were purchased, grab samples of water discharges should be collected and analyzed. If these analyses show PCB levels at or above the prescribed level, the firm should initiate a program to define the extent of contamination of your facility and means of reducing or eliminating discharge of PCBs." (Please note that effluent regulations and water purity standards do not deal solely with PCBs, other chemicals can be - and often are - involved. Pollution abatement is going to be a way of life whatever products industry uses.)

- Some customers may try to make this issue one in which Monsanto bears responsibility. We do not accept this argument. On August 3, 1973 we sent all our Pydraul customers the attached letter which asks them to inspect their facilities to insure compliance with new regulations. You may wish to remind them of this and send them a copy if they claim that Monsanto did not alert them to potential problems. Prior to this we sent a series of eight letters beginning in February 1970 which kept them abreast of the PCB situation. Please remind them that the current Pydraul line, i.e. Pydraul 230C, 312C, 320C, 540C, MC, 10E, 29E LT, 30E, 50E, 65E, 90E and 115E, does not contain PCBs.

I trust the above will provide you with sufficient information to deal with these customer inquiries. It looks as if this PCB issue will be around for sometime. We intend to keep abreast of the situation and inform the field sales as any new developments occur. In the meantime, let's keep our responses

to the customers as pleasant, yet direct as possible. This situation bears close scrutiny at major accounts where potential drain and refill alternatives are to be considered in reducing the PCB level.

Thank you for your cooperation in this matter.

W. H. Slowikowski

/pep
Attachments