Monsanto

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FROM (NAME & LOCATION): C. Paton - B2SC

DATE: September 20, 1974

SUBJECT: PCB CONTROL/HELP TO OUR CUSTOMERS

REFERENCE:

TO: T. L. Gossage
B2SL

cc: H. S. Bergen - B2SL
W. B. Papageorge - B2SJ
E. E. Stewart - 1740
W. R. Richard - T3A
J. R. Savage - B2SL
D. Wood - B2SC
P. G. Benignus - B2SC
J. F. Stapleton - B2SA

In anticipation of customer questions following Ed Stewart's presentation at this Symposium, Howard requested that I prepare "policy" answers which I could give if customers ask directly what help Monsanto can give. I've framed some possible questions and given suggested answers. Please review and comment.

1. Q. Can I send effluent samples to Monsanto for analysis?

   A. We must, I am afraid, decline to provide a routine sampling service. There are two reasons for this:

      (a) If our results were lower than any EPA spot checks, for example, your arguments might be weakened and suspect simply because you had used Monsanto - the sole PCB producer in the U.S. - for the analyses.

      (b) Our analytical laboratories are a service to all Monsanto's research and production facilities. Accordingly it can at times be impossible to give the rapid turn-around that you might require.

      For those of you who cannot justify your own analytical services, we can provide a list of analytical laboratories which we feel are qualified to measure PCBs at very low levels. If you would like such a list please see me during a break or write me and we'll supply the list.

2. Q. Before we gear up to run our own sampling (or contract with an outside laboratory) we'd like help in establishing sampling techniques, analytical procedures, etc. What can you do for us?

   A. Ed Stewart has given you an outline of good sampling techniques. We will write some of this up if our experience can be of value to you.

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As for analytical procedures, the recently published ASTM D-3033 and 3034 standards were based to a large extent on Monsanto procedures. Paul Benignus is very keen to get round-robin testing underway in order to establish the accuracy of these methods. Perhaps you (or the outside laboratory you select) would like to be part of the round-robin tests. Do you agree Paul?

3. Q. Monsanto has obviously done a lot in controlling PCB effluent in your own plant, what help can you give me to achieve the same kind of reduction?

   A. We hope Ed Stewart's presentation has given you some ideas to think about. You probably want to reflect on how some of this is applicable to your situation - since we doubt if plants are all exactly alike. You may be like Sangamo and have to cope with other effluents which are as bad if not worse than PCB. Maybe you could take Jess Butner's approach and use a good engineering concern to assist you.

   (Substitute or include any useful parts of Westinghouse presentation.)

4. Q. I agree I may need to get my own engineering contractor on this but how do I know he's competent to do the job?

   A. Maybe you can join our plant tour tomorrow which would show you a lot of what Ed has been talking about. If you can't stay over or if you would like to send somebody up to visit our plant we'd be happy to arrange this given sufficient notice, etc. To set such a visit up either contact your fluids salesman or his regional manager.

5. Q. Your plant doesn't really have the same kind of problems mine does, what help can you give to me on an individual basis?

   A. When we discontinued sales of PCB as heat transfer fluids almost three years ago, we set up a task force to help customers convert to non-PCB fluids. This task force consisted of a team of chemical engineers from our central engineering department who were assigned to our technical service/marketing group for a definite period of time. These engineers were available to handle enquiries and to make customer visits. Their job was to convey our experience of

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heat transfer fluids to customers in a way that could be related to specific customer situations. Obviously these engineers could not make the decision as to what the customer should do. That decision has to rest with the customer. But we think the Task Force did an effective job. One criterion is the fact that we converted over 90% of our customers to one of our non-PCB heat transfer fluids. We did this even though the abrupt discontinuation of PCBs inconvenienced hundreds of customers and we had competitors anxious to take advantage of the situation. We are not trying to brag but merely to point out how we tackled one of the problems of PCBs. We are giving serious consideration to establishing another Task Force to pass on our experience in PCB effluent control. The size and nature of such a Task Force will, of course, depend to a great extent on what the EPA Effluent Standard says when it issues. But a suitable Task Force available to our customers for a limited time period - say 3 to 6 months - is not out of the question. How well would a Task Force satisfy your need for help? (This might then elicit suggestions which we could "take under consideration".)

C. Paton

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