

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 654-1000

December 22, 1975

Mr. Earl J. Stephenson
Director, Enforcement Division
Environmental Protection Agency
1735 Baltimore
Kansas City, Missouri 64108

Dear Mr. Stephenson:

I have carefully reviewed the information I forwarded to you on December 11 and have the following corrections, additions and comments to offer.

- 1(a) Exhibit C which was sent to you was not complete. A revision is attached.
- 1(c) Note that Exhibit I is for the period ending June, 1975. All quantities shown for the months July thru December in this report are for 1974.
- 2(a) In Exhibit A, I grouped the PCB products by application. I did not intend to imply that the materials listed under Base Products were not distributed "as is" to these applications.

Base Products were sold directly to the following uses:

Transformer and Capacitor Fluids

Aroclor 1016
Aroclor 1242
Aroclor 1254
Aroclor 1260

0480620

A unit of Monsanto Company

Plasticizer Applications

Aroclor 1221
Aroclor 1232
Aroclor 1242
Aroclor 1248
Aroclor 1254
Aroclor 1260
Aroclor 1262
Aroclor 5060
Aroclor 5432
Aroclor 5442
Aroclor 5460

- 2(d) Products distributed thru Monsanto's Anniston, Alabama unit included the Aroclor 6000 series as well as those shown on Exhibit D.
- 2(e) See comment 1(c) above regarding Exhibit I. See comment 2(d) above regarding products from the Anniston, Alabama facility.
- 5(b) Exhibit K has been revised to correctly reflect proper breakdown. Totals are not changed.
- 5(d) Exhibit L has been revised to show accurate totals.
- 7(a) Water effluent from the Sauget, Ill. facility is discharged to the Municipal Treatment Plant.
- 8(a) The majority of the PCB components or mixtures and the products we make using PCB components or mixtures are liquids and are transported in bulk or in steel drums as I indicated previously. Bulk shipments are made in railroad tank cars and tank trucks in every case. Tank truck deliveries involved customer pickup. Two products which we formerly manufactured were solids. These were Aroclor 5460 and Montar 5. Aroclor 5460 was shipped in 100# multiwall paper bags. Montar 5 was shipped in 40 gallon fiber drums.

I hope you find this information helpful. If I can be of further service, please let me know.

Sincerely,


W. B. Papageorge
Manager, Product Acceptability
Process Chemicals Division

CC: Mr. Stanley W. Legro
U. S. Environmental Protection Agency
401 "H" Street, SW
Washington, D.C. 20460

0480621