

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ROGER DALE HOLLAND AND DRENDA)
SHEPARD HOLLAND, INDIVIDUALLY)
AND AS NEXT FRIENDS OF TAUSHA)
MARIE HOLLAND AND JESSICA)
NICOLE HOLLAND; WILLIE MAE)
HOLLAND AND J. SELMON HOLLAND)
Plaintiffs,)

vs.)

C. A. NO. C-91-78

MONSANTO, INC.; CENTRAL POWER)
AND LIGHT COMPANY; AND HOUSTON)
LIGHTING & POWER COMPANY,)
Defendants.)

DEPOSITION OF WILLIAM PAPPAGEORGE
Taken behalf of the Plaintiffs
June 27, 1991

COPY

Reported by
Suzanne Benoist, RPR, CSR
for
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DEPOSITION OF WILLIAM PAPPAGEORGE, produced,

sworn, and examined on behalf of the Plaintiffs on
June 27, 1991, between the hours of eight o'clock in
the forenoon and five o'clock in the afternoon of that
day at the offices of Husch, Eppenberger, Donohue,
Cornfeld & Jenkins, 100 North Broadway, Suite 1300,
St. Louis, MO 63102, before SUZANNE BENOIST, a
Registered Professional Reporter and a Notary Public
within and for the State of Missouri.

APPEARANCES

The Plaintiff was represented by the law firm of Edwards & Terry, 1400 Texas Commerce Plaza, P.O. Drawer 480, Corpus Christi, Texas 78403 by Mr. Michael G. Terry.

The Defendant Monsanto was represented by the law firm of Woodard, Hall & Primm, P.C., 7000 Texas Commerce Tower, Houston, Texas 77002 by Mr. Robert A. Hall.

The Defendant Houston Lighting & Power Company was represented by the law firm of Baker & Botts, One Shell Plaza, 910 Louisiana, Houston, Texas 77002-4995 by Mr. Tracy D. Hester.

The Defendant Central Power & Light Company was represented by the law firm of Bracewell & Patterson, 2900 South Tower Pennzoil Place, Houston, Texas 77002 by Ms. Lisa D. Anouilh.

The Defendant United States of America was represented by the U.S. Department of Justice, Torts Branch, Civil Division, P.O. Box 340, Ben Franklin Station, Washington, DC 20044 by Mr. Michael T. McCaul.

INDEX OF QUETIONERS

MR. TERRY

5

MR. MCCAUL

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1 IT IS HEREBY STIPULATED AND AGREED by and
2 between Counsel for the Plaintiff and Counsel for the
3 Defendant, that this deposition may be taken in
4 shorthand by SUZANNE BENOIST, a Registered
5 Professional Reporter and Notary Public, and
6 afterwards signed by the Witness.

7

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o-O-o

9

WILLIAM PAPPAGEORGE

10 of lawful age, being produced, sworn and examined on
11 the part of the Plaintiff, deposes and says:

12

EXAMINATION

13 QUESTIONS BY MR. TERRY:

14

[MARKED DEPOSITION EXHIBITS NO. 1-19]

15

16 MR. TERRY: So it is stipulated by and
17 between the parties that the original deposition will
18 be entrusted to Mr. Hall who will secure the signature
19 of the witness Mr. Pappageorge within -- how much time
do you want?

20

21 MR. HALL: Whenever I can get it and get
it to him.

22

MR. TERRY: 20 days?

23

MR. HALL: We can do it in 20 days.

24

25 MR. TERRY: Within 20 days unless that
time is extended by agreement thereafter, if a signed

1 copy is not available an unsigned copy may be used in
2 lieu thereof.

3 The deposition will be taken according to
4 the rules, that is all objections will be reserved
5 until the time of trial except as to the form of the
6 question and responsiveness to the answer. So agreed?

7 MR. HALL: And signed before any notary
8 public?

9 MR. TERRY: Yes.

10 MS. ANOUILH: Yes.

11 MR. HESTER: Yes.

12 MR. MCCAUL: Yes.

13 Q. (By Mr. Terry) Could you tell us your
14 name sir?

15 A. William B. Pappageorge.

16 Q. Pappageorge. And where do you reside,
17 sir?

18 A. In St. Louis County, Missouri.

19 Q. And how old a man are you?

20 A. I am 68.

21 Q. Are you currently employed on a regular
22 basis?

23 A. No.

24 Q. Did you retire from Monsanto?

25 A. I did.

1 Q. And in what year did you retire?

2 A. My last working day was December 31st,
3 '86.

4 Q. You remember it like most of us remember
5 the day we got out of the Army.

6 A. Yes. It's different from all the other
7 days.

8 Q. How long had you been with the company?

9 A. 35 years.

10 Q. Had you been employed at any other
11 company before starting with Monsanto?

12 A. I was with Phillips Petroleum Company in
13 Oklahoma.

14 Q. And how long were you with Phillips?

15 A. Four years.

16 Q. And before that?

17 A. A student.

18 Q. And where did you go to school?

19 A. Washington University in St. Louis.

20 Q. And the year that you graduated?

21 A. I got my Bachelor of Science degree in
22 1943 and my Master of Science degree in 1947.

23 Q. Was there a service break?

24 A. Yes.

25 Q. Did you go to work for Phillips after you

1 obtained your Masters?

2 A. I did.

3 Q. What kind of work did you do for
4 Phillips?

5 A. I would categorize it as two different
6 types. One was as a research engineer working on
7 drilling mud problems and secondary recovery problems.
8 The second assignment was the, as a design engineer
9 designing facilities for refining petroleum.

10 Q. What year did you start with Monsanto?

11 A. 1947.

12 Q. I thought you went to Phillips in '47.

13 A. I'm sorry, you said Monsanto. '51 for
14 Monsanto.

15 Q. I know 35 years with the company you held
16 a great many positions and did a great many jobs but I
17 would appreciate it if you could give me sort of a
18 summary of your career at Monsanto in terms of your
19 major area of responsibility.

20 A. I'll try to condense it.

21 I was involved initially in design
22 engineering. From there I went into production
23 supervision and then maintenance supervision and back
24 into design engineering. Then I became, I managed the
25 service functions at a plant in Monsanto. This is the

1 shipping, distribution, the utilities, generation and
2 distribution, all the services that the manufacturing
3 people are required to perform their tasks. Then I
4 became a general superintendent of manufacturing at
5 the plant in Sauget, Illinois and from there I was
6 assigned plant manager at the plant in Anniston,
7 Alabama. I then was designated as manager of
8 environmental control addressing the then evolving PCB
9 environmental issues. I had that assignment from 1970
10 to 1976. Through those years I picked up additional
11 products in addition to PCB's. I was then designated
12 as a director of environmental operations for
13 different operating units in Monsanto through the
14 years '77 through '85. Then in 1986 I was named
15 manager of occupational health for the chemical unit
16 in Monsanto.

17 Q. And that is the position from which you
18 retired?

19 A. That is correct.

20 Q. You have had an opportunity to speak with
21 attorneys representing Monsanto about this particular
22 case.

23 A. I have.

24 Q. And you are aware that this particular
25 case involves PCB's.

1 A. I do.

2 Q. You were kind enough to mention the
3 specific dates that you were the manager of
4 environmental control, 1971 through 1976.

5 A. Yes. The title did change but the job
6 didn't.

7 Q. And you indicated that the position was
8 either created or you were assigned to the position
9 because of the then evolving environmental issue
10 involving PCB's.

11 A. That is correct.

12 Q. Prior to 1900 and 71 in the various
13 positions or job assignments that you had held had you
14 had contact with PCB's?

15 A. Yes.

16 Q. Could you identify for me the contact
17 that you had?

18 A. All right. My initial involvement was as
19 a maintenance supervisor and superintendent. I was
20 responsible for the activities of the electricians in
21 the plant. This group was the group that was involved
22 with the servicing, repair of electrical equipment
23 which contained PCB's. It was my obligation to know
24 proper handling, safe handling of the material.

25 Q. When did you have that position?

1 Roughly.

2 A. Roughly about -- from '55 to '58,
3 roughly.

4 Q. And thereafter?

5 A. And then the next involvement as a
6 superintendent of the services unit at this plant. I
7 was responsible for the operation of a unit that
8 blended chemicals for packaging and sales. That
9 blending operation as scheduled would produce
10 industrial hydraulic fluids which contained PCB's.
11 There again I had to know the proper handling by the
12 employees as well as the disposal, cleanup, all the
13 core activities associated with an industrial
14 chemical.

15 Q. And what year did you have that position?

16 A. That was 1962 to '64 or something like
17 that.

18 Q. Then thereafter?

19 A. Then my next major involvement was as
20 plant manager of the Anniston, Alabama plant at which
21 PCB's were manufactured.

22 Q. And what year were you in Alabama?

23 A. 1965 through 1969.

24 Q. The two-year period between '69 and '71
25 did you have any direct involvement with PCB's?

1 A. I'm sorry. I should have said '70
2 instead of '71. This goes through '69 and then on the
3 1st of January 1970 I was assigned manager of
4 environmental control.

5 Q. Okay.

6 In connection with your educational
7 background you had indicated a BS and an MS.

8 A. Yes.

9 Q. Was it in chemistry or chemical
10 engineering?

11 A. Chemical engineering.

12 Q. What did you do as the manager of
13 environmental control?

14 A. I was -- my primary responsibility was to
15 act as the focal point for all the information that
16 was being generated both within Monsanto and
17 elsewhere, world-wide. I tried to disseminate that
18 information with the objective of making sure that the
19 left hand knew what the right was doing and to try to
20 encourage openness between the various groups that
21 were making all these studies and this included not
22 only Monsanto's research department, engineering
23 department and the like but the universities,
24 governmental agencies, private laboratories and
25 customers.

1 Q. As director of environmental operations
2 in connection with PCB's what did you do?

3 A. Director of environmental operations
4 involved environmental and work place health in the
5 broadest terms. I had a, I was assigned to a unit
6 within Monsanto, I had a staff of appropriate types of
7 people to help me and as far as the environmental
8 engineer reporting to me and his relationship to PCB's
9 was to make certain that any regulations that applied
10 to PCB's were being followed by the plants that he was
11 assigned to.

12 Q. You were concerned then with the
13 environmental operations of Monsanto's own premises,
14 facilities and plants?

15 A. That is right.

16 Q. And then the last year you were with the
17 occupational health chemical unit?

18 A. Yes.

19 Q. Same thing?

20 A. There it related to yes, just Monsanto
21 plants.

22 Q. What was the difference between
23 occupational health and environmental operations?

24 A. Environmental operations had three major
25 areas of interest, one is what we called product

1 safety, the proper labeling of product, proper
2 packaging, proper shipping, proper information issued
3 to the customer.

4 The secondary was environmental
5 activities at each of the plants. What are you doing
6 with your waste waters, what's going up your stack and
7 what are you burning.

8 Then the third area was employee
9 exposure. As director of environmental operations the
10 unit that I was signed to represented a, roughly a
11 fifth of Monsanto to give you an idea of the size. As
12 manager of occupational health later I concentrated
13 only on occupational health at Monsanto's plants for
14 about 45 plants. So the plants were increased but the
15 focus was narrowed.

16 Q. In connection with your work as director
17 of environmental operations were you responsible for
18 as one of the three areas you identified customer
19 information concerning the products?

20 A. No.

21 Q. I'm sorry, then I misunderstood you.

22 A. I shouldn't say that. As part of the
23 product safety activity the individual assigned to
24 that activity and reporting to me was responsible for
25 communicating to the customer appropriately. Either

1 telephone request, letter request, salesman contact,
2 whatever it took he was to make certain that the
3 information was forwarded quickly and accurately.

4 Q. This would be information of a technical
5 nature?

6 A. Most of it is technically based but we
7 try to couch it in language that we thought the
8 recipient could understand so that a medical doctor
9 would get a different grouping of words so to speak
10 than the foreman at a plant.

11 Q. Was that function, and by that function I
12 mean communicating information technical based in
13 language appropriate to the person you're
14 communicating to always a part of environmental
15 operations? As far as you know.

16 A. No. Because environmental operations
17 didn't become a recognized assignment as such in
18 Monsanto until 1977. Prior to that that information
19 relating to any product was primarily the
20 responsibility of the marketing department.

21 Q. When you say it was the responsibility of
22 the marketing department, was there a recognized unit
23 or group of people that communicated technically based
24 information?

25 A. There were two principle sources of

1 technical information, one was the research chemist
2 and the other was Monsanto's corporate medical
3 department.

4 Q. Were they part of the marketing
5 department?

6 A. No. They were staff departments and
7 served as a resource of information for the marketing
8 people.

9 Q. Was there any group or unit within the
10 marketing department that was responsible for
11 communicating technically based information to
12 customers prior to 1977?

13 A. There was an individual at least in each
14 of the marketing groups in Monsanto that was located
15 in St. Louis who had a strong technical background and
16 was familiar with the product line that the group
17 handled. He would serve as the, generally as the
18 first technical contact the field salesman might call
19 on. You notice I said might, he didn't have to. He
20 could call the research fellow or the medical doctor
21 directly but there was an individual assigned in the
22 marketing group that had the technical know how to
23 support the field salesman.

24 Q. In connection with, and forgive me, how
25 do you pronounce the trade name for PCB, fluid used in

1 transformers?

2 MR. HALL: Askarel?

3 A. Askarels is the generic term for fire
4 resistant fluids used in electrical equipment.
5 Askarel. A-s-k, Askarel.

6 Q. (By Mr. Terry) And I've seen the term
7 Aroclor?

8 A. Aroclor. That's a Monsanto trademark for
9 chlorinated chemicals that involve the benzene ring.

10 Q. Which name is more appropriate for
11 transformer fluid containing PCB's that would have
12 been marketed by Monsanto so that you and I can
13 communicate?

14 A. Askarel was used by the, those people
15 that represented the manufacturer and the user of the
16 transformers and we at Monsanto understood what they
17 meant and did use the term Askarel also so that is
18 more appropriate than Aroclor because Aroclor was a
19 trademark for products that were used for many, many
20 other uses in addition to an ingredient in
21 transformers.

22 Q. Then let's use the term Askarel.

23 A. Very good.

24 Q. In the marketing department was Askarel
25 its own product line or part of another product line?

1 A. In the marketing group there was an
2 individual assisted by this technical person located
3 in St. Louis that addressed only the uses in
4 electrical equipment.

5 Q. Do you know who that individual was?

6 A. Yes, I do.

7 Q. And who was that?

8 A. Paul Benignus.

9 Q. How long did Paul occupy that position?
10 Because I'll never pronounce his last name correctly.

11 A. Mr. Benignus, the position of heading the
12 marketing group, I just don't recall exactly. It
13 would have to be 15 years at least.

14 Q. Did he always have the same individual
15 with technical know how to support him?

16 A. No. That individual was, that assignment
17 was changed several times in that period of time. I
18 don't recall all the individuals involved.

19 Q. Is Mr. Benignus still around?

20 A. Yes.

21 Q. Is he still with the company?

22 A. No. He retired in 1974.

23 Q. Prior to 1900 and 70 had you personally
24 had any contact with the function of communicating
25 technical information in lay or appropriate language

1 to customers?

2 A. In a very limited way, yes.

3 Q. Can you describe that way for me?

4 A. As plant manager at the Anniston plant I
5 on many occasions played host to representatives of
6 customers who came by the plant to see our facility
7 and exchange information. During those meetings,
8 conferences, there were times when the new technical
9 data was available and we would share it with the
10 customer's representatives. But as I said earlier it
11 was quite limited. The frequency of which new data
12 would generate wasn't that great that it involved a
13 lot of communicating.

14 Q. Other than the occasional contact you
15 would have with customers and communicate technical
16 information while you were plant manager in Alabama
17 did you have any other personal involvement with the
18 process of communicating technical information to
19 customers of Monsanto as it relates to Askarel?

20 A. Prior to 1970?

21 Q. Yes.

22 A. Prior to 1970, no.

23 Q. After 1970 was your relationship with the
24 process of communicating technical information to
25 customers limited to supervising those people in the

1 environmental volume group that were responsible for
2 that function?

3 A. I didn't mean to mislead you. I was
4 alone, I didn't have any staff at that time. As
5 manager of environmental control I was it.

6 Q. Okay.

7 A. It was only as director of environmental
8 operations that I had a staff. That was later, in
9 '77.

10 Q. So between '70 and '76 did you personally
11 then communicate technical information to customers?

12 A. Yes.

13 Q. And then when you were director of
14 environmental operations, that's when you had the
15 staff.

16 A. Correct.

17 Q. That actually did the work under your
18 supervision.

19 A. Correct.

20 Q. In connection with Askarel while you were
21 lead manager of environmental control was Monsanto
22 still producing Askarel, still making it and
23 marketing?

24 A. Yes.

25 Q. When did they cease making and marketing

1 Askarel?

2 A. They ceased manufacturing July, 1977;
3 ceased marketing in September, 1977.

4 Q. Between 1970 and 1900 and 77 were there
5 any restrictions that Monsanto placed on the sale of
6 Askarel? That is restricted to closed systems, that
7 sort of thing, that you're aware of?

8 A. I hesitate because by speaking of
9 Askarels it was limited to electrical equipment which
10 by definition is closed, sealed equipment.

11 Q. Okay.

12 A. There were Monsanto restrictions on the
13 sale of PCB's for other uses but not related to
14 Askarels.

15 Q. So by using the term Askarel I am
16 defining a product designed for a closed system.

17 A. That is correct.

18 Q. Were there restrictions in place between
19 '70 and '76 on Aroclor?

20 A. Yes there were.

21 Q. Did you deal with those in connection
22 with dealing with customers?

23 A. Yes.

24 Q. Generally what were those restrictions on
25 the Aroclor?

1 A. On the Aroclor line of products there
2 were restrictions based on perceived ease of entry
3 into the environment so if the use was let's say a
4 paint that's used to mark the traffic lanes on
5 highways that was discontinued in 1970. The use in
6 industrial heat transfer systems where the PCB is used
7 as a hot fluid that's used to perform some heating in
8 a remote location, that was continued through 1971 and
9 terminated late in '71. The use in the carbonless
10 copy paper as a solvent for the ink, that was
11 discontinued early 1971. Those are examples of the
12 kinds of --

13 Q. Uh-huh.

14 A. So Monsanto's refusal to sell to these
15 uses varied through that period of time and different
16 dates were set up as targets.

17 Q. With respect to you personally did you
18 participate in any of the decisions to terminate sales
19 for particular uses?

20 A. Yes..

21 Q. Who else would participate in those
22 decisions?

23 A. Well --

24 Q. I mean was it a decision made completely
25 within the environmental control?

1 A. No. All I could do was to strongly
2 advise certain approaches. The advice I was able to
3 give was considered by an informal group which
4 represented the marketing representatives of the group
5 that sold these products, the research people
6 associated with the product, the engineering people,
7 the medical department. I'm sure I didn't get them
8 all but it was a good size group, it's about 15, 20
9 people. We then took our collective thoughts and gave
10 them, passed them on with strong recommendations they
11 be adopted to the managers, the directors of these
12 businesses. That in turn was taken to the, what I
13 consider the top Monsanto, corporate Monsanto
14 committee composed of the president, chairman of the
15 board and his senior vice-presidents for their review
16 and support.

17 Q. The initial group in this decision making
18 process, the group of 15 or so, was that an ad hoc
19 group for the particular use of Aroclor? Or was it a
20 standing committee?

21 A. No. It's an ad hoc group addressing the
22 Aroclors in its many uses, not just one use.

23 Q. Okay. So this group of 15 was ad hoc for
24 the uses of the Aroclor.

25 A. Correct.

1 Q. Did it essentially consist of the same
2 people more or less during the period '70 to '76?

3 A. Yes but I don't want to mislead you. The
4 group was very active in '70, '71 and as the company
5 withdrew from these sales many of those people were no
6 longer involved so the group kind of shrank in size to
7 the point where finally the use in electrical
8 equipment was the only use so that was limited then to
9 three or four people.

10 Q. The second level that you identified was
11 the directors or the managers of the particular
12 business groups. What do you mean by business groups?

13 A. Monsanto at the time was organized as far
14 as its marketing approach was concerned into business
15 groups.

16 Q. Defined by customers?

17 A. Defined by type of product sold. The two
18 groups in Monsanto that were involved with the PCB
19 products were the functional fluids group which tries
20 to describe the use of fluids in industry as
21 distinguished from a chemical that is changed and
22 converted to some other product. The second group was
23 known in Monsanto as the plasticizer group, they sold
24 chemicals primarily intended to add to plastic
25 materials to make them flexible instead of brittle.

1 The Aroclor PCB's were used for some of their
2 applications.

3 So those groups were headed by a director
4 and reporting to those directors were people that
5 represented research, manufacturing, marketing and
6 engineering. So they formed a team and addressed that
7 particular product line.

8 Q. And then the next level of decision would
9 be at the corporate officer level.

10 A. Yes.

11 Q. During this period of time was Monsanto
12 actually refusing to sell Aroclor to customers who
13 intended to use it for particular applications?

14 A. Yes.

15 Q. If they wanted to use it for carbonless
16 copy paper Monsanto would refuse to sell.

17 A. That's right.

18 Q. And that was the type of decision that
19 this decision making process ultimately resulted in.

20 A. Correct.

21 Q. The group of 15, without asking you to
22 list all the names when the group was at its most
23 active, generally what areas did they represent?

24 You, environmental control.

25 A. Correct.

1 Q. I assume there was someone from
2 marketing?

3 A. There was two people from marketing, one
4 was from the plasticizer group, the other from the
5 functional fluids group.

6 Q. What other types?

7 A. Research directors from the two groups, a
8 representative from the medical department, at least
9 one, sometimes two would show up. Engineering
10 department, corporate engineering department. A
11 representative of corporate manufacturing and then we
12 had of course the press relations person and we had an
13 attorney.

14 Q. How --

15 A. I think that covers all. I have a
16 feeling I missed somebody.

17 Q. Without asking you to identify the people
18 those would roughly be the interests represented in
19 the group of 15.

20 A. Correct.

21 Q. How were specific applications addressed?
22 How did you decide to look at any particular
23 application? How would a question come up so to
24 speak?

25 A. Well the discussion of course was free

1 and moving throughout the room. Of course there had
2 been previous informal discussions about the need for
3 holding such a meeting and what should we do so by the
4 time the group got together they had already in
5 essence had defined what we eventually came to call
6 the open use and the closed use systems. By open use
7 we were referring to such applications as the
8 carbonless copy paper and the paint and sealant
9 applications, those are just examples. The sealed
10 systems we included such things as the use in
11 electrical equipment, the use as an industrial heating
12 fluid and the use as an industrial hydraulic fluid.
13 Those were considered to be closed systems. With that
14 base in mind the group decided that we had no control
15 over that open use. Once the product was manufactured
16 and used it hit the environment so that decision was
17 made to terminate sales to that as quickly as
18 possible.

19 The other uses involved decisions such as
20 educating the users for need for tight control,
21 prevent entering the environment, but we would
22 continue to sell to those uses barring any new
23 information.

24 That's really the gist of the discussion.

25 Q. When the group was formed then had the

1 decision been reached to restrict sales to open use of
2 PCB's?

3 Stated another way, would it be fair to
4 say that as of 1900 and 71 Monsanto had made the
5 decision not to sell PCB's or products containing
6 PCB's to any use defined as an open use?

7 A. That is correct.

8 Q. Did you participate in the decision of
9 the company to so restrict sales?

10 A. Yes.

11 Q. When was that particular decision made?
12 Roughly.

13 A. The ad hoc group had made that decision
14 by late February, 1970. In March we reviewed this
15 with the two directors of the business groups and they
16 in turn with their supervision and in April I was the
17 spokesman that went before this top corporate
18 committee and proposed a program for withdrawal from
19 these markets.

20 Q. And we know that the top corporate people
21 responded favorably to your proposal, accepted your
22 recommendations.

23 A. I don't want to mislead. They accepted
24 the overall plan but they were impatient with the
25 timing so we were asked to go back and hasten the

1 program.

2 Q. They wanted you to move faster?

3 A. Which someone else went back later since
4 I was not available and proposed new target dates
5 which then the full proposal was acceptable, the
6 access plus the timing.

7 Q. Were the people at the top of the
8 corporation interested in moving faster or slower?

9 A. Faster.

10 Q. And so it was an accelerated timetable
11 that was presented the second time around?

12 A. Correct.

13 Q. And then in 1900 and 77 Monsanto ceased
14 to sell PCB's even to the closed system or the closed
15 use; is that right?

16 A. To the remaining closed system
17 application which was electrical equipment.

18 Q. So Askarel would be the last to go?

19 A. Correct.

20 Q. Between 1900 and 70 and 1900 and 77 was
21 part of the program that you were describing making
22 certain that the customers of Askarel, other closed
23 system users, have as much information as possible?

24 A. That is correct.

25 Q. As much information as was available to

1 you?

2 A. Correct.

3 Q. From 1970 until 1977 was that program of
4 communicating information to the end users -- let me
5 ask the question another way.

6 From 1970 to 1977 was that program of
7 providing information to the customers followed by
8 your company?

9 A. Yes.

10 Q. Did that program include providing
11 information to the end user?

12 A. Not by Monsanto.

13 Q. I am aware that Monsanto sold Askarel
14 directly to customers such as utility companies. Is
15 that correct?

16 A. For a period of time. That was
17 terminated in 19, I think it was 1971 or 2, somewhere
18 in there.

19 Q. Monsanto also sold Askarel to those
20 companies that manufactured transformers such as
21 General Electric.

22 A. Yes.

23 Q. And in fact permitted General Electric to
24 use its own trade name to describe the Askarel fluid.

25 A. Yes.

1 Q. So when you would be communicating
2 information between '70 and '77 to customers you would
3 be communicating to people like General Electric for
4 the most part.

5 A. For the most part, yes.

6 Q. Particularly if you ceased selling
7 directly to utility companies in 1972.

8 A. Correct.

9 Q. Did you understand that the information
10 you communicated to General Electric about Askarel
11 would have to be communicated by General Electric to
12 the end user?

13 A. Yes. That was a strong understanding.

14 Q. Were you aware then that General Electric
15 had to have enough information from Monsanto, the
16 manufacturer of the Askarel, in order to effectively
17 communicate sufficient information to its customers?

18 MR. HALL: Excuse me. Would you read
19 that back?

20 (WHEREUPON REPORTER READ FROM THE RECORD AS DIRECTED).

21 Q. (By Mr. Terry) And by that so there's no
22 confusion would be the customers of General Electric.

23 A. I understand that.

24 Q. Okay.

25 A. I hesitate because Monsanto prepared

1 blends of fluids as specified by customers like
2 General Electric. That blend is the Askarel. One of
3 the ingredients is a PCB. Information relating to
4 PCB's was certainly available from Monsanto and was
5 conveyed to General Electric. Monsanto could not
6 relay information regarding other ingredients that
7 General Electric selected to put into that mixture so
8 General Electric would have to get that information
9 from other sources, other suppliers.

10 Q. I appreciate the clarification. So that
11 I understand, the Monsanto-manufactured element of a
12 fluid that would become Askarel would be the PCB's.

13 A. Correct.

14 Q. The other elements of the fluid would be
15 manufactured by people other than Monsanto?

16 A. Correct.

17 Q. And then Monsanto would blend the
18 components and produce the fluid known as Askarel.

19 A. Correct.

20 Q. Would General Electric specify the
21 components of the fluid as far as you know?

22 A. Yes.

23 Q. Would they specify the supplier for
24 components other than those manufactured by Monsanto?

25 A. There were times when they would specify

1 supplier but that wasn't always the case. It depended
2 on their perception of the quality of the material
3 from given suppliers.

4 Q. Setting aside the question then of the
5 other components in the suit that made up the Askarel,
6 for a customer like General Electric the source of
7 information about PCB's would have to be Monsanto.

8 A. Definitely, yes.

9 Q. And Monsanto would have to communicate
10 enough information about PCB's to its customers so
11 that they would be able to effectively communicate
12 enough information to their customers?

13 A. That is correct.

14 Q. And you would have recognized then that
15 with respect to the PCB that was a component in the
16 Askarel Monsanto was the source of information about
17 that component?

18 A. We were the primary source but General
19 Electric and others were able to get information from
20 other sources, Government agencies, the university
21 laboratories, private laboratories, so there's nothing
22 to prevent them from including that information in
23 their knowledge base to forward to their customers as
24 appropriate.

25 Q. I understand that Monsanto may not have

1 been the exclusive source of information about PCB's
2 but it was the primary source?

3 A. Correct.

4 Q. Would you agree that in terms of
5 Monsanto's responsibility as the manufacturer of the
6 PCB Monsanto had the responsibility to communicate
7 adequate information to its customers such as General
8 Electric?

9 A. Yes.

10 Q. And Monsanto had the responsibility to
11 communicate enough information to its customers,
12 General Electric, so that they would have enough
13 information to communicate to their own customers?

14 A. Yes.

15 Q. Would it be fair to say then that
16 Monsanto understood that the information that it
17 communicated to its customers would be the primary
18 source of information communicated to the end users?

19 A. As it relates to that component, PCB's,
20 yes.

21 Q. Yes. Would you agree with me that the
22 end users of the Askarel are generally speaking
23 utility companies such as Houston Light and Power,
24 Central Power and Light or would there be others that
25 you would consider to be the end users?

1 A. There are many end users. I have no
2 measure of the volumes or numbers of pieces of
3 equipment. There are commercial buildings, Government
4 buildings, Holiday Inns. That's throughout our
5 society.

6 Q. I appreciate that, I don't mean to use
7 the utility companies as the sole member of the class
8 of end users but does the term end user as you
9 understand the term include the utility companies?

10 A. Yes.

11 Q. The reason that I ask the question is I
12 am not certain of the chain of distribution of the
13 Askarel. My perception is that the Askarel would be
14 supplied to General Electric, General Electric would
15 then supply a transformer containing Askarel or using
16 its own trade name to the end user which would be
17 someone like the utility company or the Holiday Inn,
18 that sort of thing.

19 A. That is correct.

20 Q. Do you know whether or not Monsanto
21 actually prepared for its own customers, say General
22 Electric as an example, information in a form that was
23 intended to be communicated to the end user? And
24 again so that we understand each other I'm still
25 talking about that period of time of '70 to '77 when

1 you personally were involved in that.

2 A. Monsanto did not prepare a document
3 intended for the customers of our customers.

4 Q. And in order to then get the information
5 to the end user Monsanto would be relying on the
6 intermediate at be it General Electric or someone at
7 Westinghouse or someone else to assemble the
8 information Monsanto provided in documents, booklets
9 or pamphlets that the intermediate would then give to
10 its customers?

11 A. That is correct. But in every case we
12 were told by our customers to stay away from their
13 customers. We were not allowed to communicate, so.

14 Q. I'll ask you about that but I don't mean
15 to imply any particular malfeasance or misfeasance,
16 I'm just interested in the fact that it is true that
17 Monsanto would have to rely on its customers to
18 assemble and publish the information to the customers
19 or end users.

20 A. That was done.

21 Q. So you, Monsanto, would have to rely on
22 Westinghouse or General Electric or one of your other
23 customers to assemble the information that you
24 provided them for transmission to the end user?

25 A. Correct.

1 Q. You had indicated that your customers, be
2 they Westinghouse, General Electric or others had
3 actually advised Monsanto not to deal directly with
4 the customers of customers.

5 A. That is correct.

6 Q. Was that information communicated to you
7 personally by these customers? Westinghouse or
8 General Electric?

9 A. Informally, yes.

10 Q. Was that uniform from Monsanto's customer
11 base or was it just particular for some?

12 A. I would describe it as typical in
13 industry where each supplier prefers to communicate to
14 his customers in his way and his timing and all.
15 Doesn't want other parties bypassing them. That's my
16 understanding.

17 Q. In terms of questions or requests for
18 information from customers of customers, be it the
19 Holiday Inn or the utility company, would Monsanto
20 respond to information requests from them?

21 A. Certainly.

22 Q. Were there mechanisms in place to handle
23 those questions?

24 A. Yes.

25 Q. Were the mechanisms for handling those

1 questions part of your department as manager of
2 environmental control? Would those questions come to
3 you?

4 A. Some of them, yes.

5 Q. Where else would they go or where else
6 would they be routed?

7 A. They might go to the marketing
8 representatives located in the home office. Like this
9 technical person we talked about earlier or the
10 manager of that marketing department.

11 Q. I'm sorry, I apologize for interrupting.
12 I was of the impression that when you became manager
13 of the environmental control group the arrangement
14 with Mr., or with Paul, ceased.

15 A. No.

16 Q. It continued on?

17 A. There were key people in this
18 communication network.

19 Q. Okay.

20 A. I just sort of supplied support and I
21 coached and trained and communicated and they were
22 expected to carry their message forward. They were
23 part of the network.

24 Q. His function and his contact with
25 customers and customers of customers still persisted.

1 A. Very much so, yes.

2 Q. With respect to PCB's did his, did Mr.
3 Benignus, continue to deal directly with customers and
4 customers of customers in connection with Askarel
5 until the time that Monsanto ceased making it?

6 A. No. Until the time he retired in '74.

7 Q. Okay. Was he replaced by someone else?

8 A. Yes. He was replaced by David Wood.

9 Q. Did Mr. Wood continue to provide that
10 function?

11 A. Yes.

12 Q. And I assume because PCB's are so stable
13 and persistent that Mr. Wood is still providing that
14 function?

15 A. No. Mr. Wood is no longer involved with
16 PCB's.

17 Q. Is there someone who carries on?

18 A. Dr. John Craddock.

19 Q. How long did Mr. Wood fulfill that
20 function?

21 A. I'm going to have to rely on my memory
22 here on an awful lot. I would suggest he did this
23 from '74 through --

24 Q. Just roughly, sir.

25 A. I'm trying to recall.

1 Q. And I know I'm reaching for details.

2 A. I believe Mr. Wood was still in place
3 when the sales were terminated in '77. I don't know
4 when he was resigned following that.

5 Q. Now you had indicated, and I'm changing
6 subjects now, you had indicated that your first
7 contact with PCB's, particularly Askarel, would have
8 been in '55 when you as part of your maintenance
9 supervisory responsibility became a supervisor of
10 electricians that would come in contact with
11 electrical equipment containing Askarel; is that
12 correct?

13 A. That is correct.

14 Q. And I assume that what you're talking
15 about is equipment utilized by Monsanto in its own
16 plants or facilities.

17 A. That is correct.

18 Q. As apposed to electrical service provided
19 to outside people.

20 A. Yes.

21 Can we take a break?

22 Q. Absolutely.

23 (RECESS TAKEN BY PARTIES.)

24 Q. (By Mr. Terry) The electrical equipment
25 on the Monsanto plants and facilities, was it at one

1 particular plant or facility? This is in '55 to '58.

2 A. That was in one plant.

3 Q. In connection with your work as the
4 supervisor of the electricians you had indicated that
5 you had to make yourself knowledgeable about Askarel:
6 proper handling, proper disposal, proper cleanup.

7 A. That is correct.

8 Q. Had you had an opportunity to make
9 yourself knowledgeable about those subject matters
10 before or did you have a working knowledge before '55
11 about those subject matters?

12 A. I did not.

13 Q. How did you make yourself knowledgeable
14 about that subject matter, specifically the cleanup
15 and disposal aspect of Askarel?

16 A. Well cleanup and disposal was the
17 practices involving cleanup and disposal at the time
18 was that commonly used with all of our industrial
19 chemicals. The use of such things as saw dust to pick
20 up spills was rather common. All of this material was
21 taken to a place in the plant and it was generally
22 stored in some kind of container, steel drum or what
23 have you, and then we had a service that would pick it
24 up and take it across the Mississippi River to
25 Monsanto's landfill for industrial chemicals.

1 The information relating to employee
2 exposure I received from two principle sources, one is
3 reading the available documents in Monsanto, both the
4 kind that's sent out with the products and the type
5 that is available within Monsanto and associated with
6 manufacturing procedures and operating instructions
7 and the key source really was the plant physician, I
8 sat down with him and we talked not only about PCB's
9 but anything else that these people might be exposed
10 to.

11 Q. In connection with the disposal of
12 Askarel that your electricians would have picked up
13 after a spill or just simply because the Askarel had
14 to be discarded, if my understanding is correct your
15 responsibility as the supervisor would end once the
16 material was placed in the 55 gallon drums.

17 A. That is correct.

18 Q. Did you have any responsibility for
19 transport to the landfill or operation of the
20 landfill?

21 A. In 1955?

22 Q. Yes.

23 A. No.

24 Q. Have you had any responsibility in your
25 other positions for operation of the landfill or a

1 landfill actually run by Monsanto?

2 A. I did not personally, no.

3 Q. At any time?

4 A. At any time. Correct.

5 Q. In terms of information communicated to
6 customers concerning disposal of discarded Askarel at
7 any time in your career what sort of information have
8 you communicated?

9 A. The information I was able to communicate
10 was primarily one of cautioning them about getting
11 into the environment. When asked specifically what
12 could be done I was able at that time to tell them you
13 find a properly authorized landfill and dispose of it
14 as described by the local authorities in that landfill
15 but assure yourself if you can that that landfill does
16 not come into contact with any water, surface water or
17 ground water. That was in the early stages. Later
18 when Monsanto designed and placed in operation an
19 incinerator I was able to tell the person with the
20 spent liquid that he could if he wished send his
21 material to Monsanto for destruction.

22 Q. When did the incinerator come on line?

23 A. 1971.

24 Q. Prior to 1900 and 71 did Monsanto offer
25 to its customers or any other entity a place to

1 dispose of spent Askarel?

2 A. No.

3 Q. You had indicated that you would caution
4 those that asked you or customers that you
5 communicated to about proper disposal in the sense of
6 avoid getting it into the environment, use a properly
7 authorized landfill, act in accordance with local
8 regulations. When were you communicating that sort of
9 information? Beginning when?

10 A. Beginning in 1970.

11 Q. It would be part of your responsibility
12 as manager of environmental control?

13 A. Correct.

14 Q. Do you know if there was any other person
15 or group within Monsanto that communicated such
16 information before you started doing it in 1970?

17 A. There was communication regarding the
18 proper disposal of industrial chemicals but prior to
19 1970 the impact on the environment of PCB's was not
20 known so I don't know of anybody that would have been
21 in a position to give that kind of instruction like
22 prevent it from getting into the environment. It was
23 treated as an industrial chemical in the broad sense.

24 Q. In connection with treating it as an
25 industrial chemical in the broad sense would the

1 directions have been to use properly authorized
2 landfills?

3 A. Yes.

4 Q. Who would have been communicating that
5 sort of information to customers of Monsanto?

6 A. Primarily the field salesmen.

7 Q. Was there an established or set piece of
8 information that would be communicated? That is, did
9 Monsanto say this is what you will tell them, in the
10 sense of use a properly authorized landfill?

11 A. Are you asking was there a piece of paper
12 on which this was distributed?

13 Q. I'll state it another way so that we
14 understand each other.

15 I am aware because Monsanto's lawyers
16 were kind enough to provide some technical information
17 that we looked at earlier that Monsanto had
18 established pamphlets or brochures about Askarel, its
19 components, its properties and that sort of thing and
20 I would assume that those were made available to the
21 sales representatives in the field and it would be the
22 source of information that would communicate to their
23 customers.

24 A. It would be a source.

25 Q. Okay. And the field representative then

1 would have a document that he could look at that would
2 give him a source of information to communicate to
3 customers.

4 A. Certainly.

5 Q. So the question I'm asking now is was
6 there an established piece of information or were
7 there documents available to the sales representatives
8 in the field that would contain information they would
9 communicate to customers about disposal of industrial
10 chemicals?

11 A. I recall some documents that addressed
12 landfills. I do not recall specifically at what point
13 in time and which documents. But I also know that the
14 field salesmen would be brought to St. Louis and have
15 training courses in which topics of this nature would
16 be covered. This does not mean that he had in his
17 hands a paragraph that he read but he was expected to
18 learn something in these training courses and use that
19 knowledge as he made his calls and if the issue was
20 ever brought up during his discussions with the
21 customer representatives.

22 Q. Now the documents that you can recall,
23 are they before us here in the exhibits that we have
24 marked?

25 A. I haven't had a chance to look through

1 all of these to look for that specific wording. It's
2 that kind of document that I vaguely recall.

3 Q. Okay. The training courses that the
4 field representatives would receive, I assume that
5 they would be hosted by Monsanto, the teachers would
6 be Monsanto employees?

7 A. Yes.

8 Q. And there would be a set topic or a set
9 agenda?

10 A. There was an agenda that covered a broad
11 range of topics.

12 Q. Was each field representative expected to
13 attend training courses such as this?

14 A. Yes.

15 Q. Is it your information that in the course
16 of these training courses that the salesmen would
17 receive instruction, I'm sorry, the field
18 representatives would receive instructions on proper
19 disposal of industrial chemicals?

20 A. Yes.

21 Q. And it would be expected then that the
22 field representative would have that information
23 available to communicate to the customers he would
24 deal with.

25 A. Yes.

1 Q. Do you have any idea of how long Monsanto
2 would have been providing that information to its
3 field representatives in the training courses?
4 Forever or do you know?

5 A. From day one. 40, 50 years.

6 Q. All right. For as long as you have been
7 connected with Monsanto was there an accepted protocol
8 for dealing with industrial chemical waste in the
9 trade or profession?

10 A. Yes.

11 Q. And did that involve the use of
12 landfills, authorized landfills?

13 A. Yes.

14 Q. Do you know personally what it takes to
15 make an authorized landfill?

16 A. I certainly don't know the details. I do
17 know that prior to the establishment of the Federal
18 environmental agencies this was in the hands of the
19 local governments and most of them were, well they
20 were either municipalities or county approvals that
21 were obtained. Other than that I don't know the
22 details. I don't know what standards had to be met
23 but I do know that they had to have the local
24 authority's approval to dispose of certain kinds of
25 materials.

1 Q. But with respect to the standards that
2 would be set for a landfill in terms of clay liners,
3 that sort of thing, would you know those details
4 personally?

5 A. Not for every state at that time, no. I
6 do know there was a summary in one of the trade
7 journals by state of what types of materials were
8 permitted but that was available in 1970, that's why I
9 remember that.

10 Q. But would it be fair to say that for as
11 long as you have been connected with Monsanto it has
12 been recognized that Askarel in terms of disposal
13 prior to 1970 was treated as an industrial chemical?

14 A. Yes.

15 Q. To be disposed of as industrial chemicals
16 were to be disposed of?

17 A. Yes.

18 Q. And the primary method of disposal was
19 properly authorized landfill.

20 A. At that time, yes.

21 Q. And that information would have been
22 communicated to the field representatives of your
23 company either by documents such as the exhibits that
24 we have seen or as part of their training courses.

25 A. That is correct.

1 Q. And it would be expected that they would
2 communicate that information to customers.

3 A. Yes.

4 Q. Are you aware of the chemical properties
5 or properties of Askarel?

6 A. I'm aware of some of them.

7 Q. Without going into a detailed discussion
8 of its properties is it fair to say that it has a high
9 order of stability?

10 A. I hesitate because I want to make certain
11 that we don't confuse Askarels with PCB's. There are
12 some components in the Askarels that don't have this
13 high order of stability.

14 Q. Well then specifically the PCB's.

15 A. PCB, many of the isomers, which are the
16 different related chemicals in that family, do exhibit
17 high order of stability.

18 Q. Is it essentially inert?

19 MR. HALL: Are PCB's inert, is that the
20 question?

21 A. I have a hard time answering that, it's a
22 little bit subjective. Under certain conditions you
23 might say it's not inert, that there are ways to
24 conduct some chemical reactions with them. One of the
25 obvious ones is just high temperature incineration,

1 that's a chemical reaction in itself. But I guess the
2 best way to describe them is they are resistant to
3 many chemical reactions that could take place in the
4 environment.

5 Q. (By Mr. Terry) Do they have low
6 volatility?

7 A. They do.

8 Q. And very low water solubility?

9 A. They do.

10 Q. Would it be fair to say that PCB's are
11 persistent in the environment?

12 A. Yes. That's been demonstrated.

13 Q. And the PCB's generally are persistent?

14 A. Some of the isomers.

15 Q. And that is one of the reasons that
16 Askarel was a desired or desirable fluid for
17 transformers.

18 A. I don't know that that was the driving
19 interest in them. The reason they were used in
20 transformers is twofold, one is their resistance to
21 flame, for fire and the other was their excellent
22 insulating property, they do not conduct electricity.
23 So those two characteristics are what made them so
24 good for this application.

25 Q. And the fact that they retain those

1 properties because of their persistence.

2 A. I suppose one could describe it that way.

3 I don't know that it's because of their persistence,
4 it's their relative inactivity chemically. Their
5 stability.

6 Q. I'm sorry, perhaps we're not
7 communicating because you attach more significance to
8 the term persistence than I do. Not so much, I don't
9 mean to apply so much the persistence in the
10 environment but the chemical properties of Askarel are
11 maintained for a long time.

12 A. Under normal operating conditions, yes.

13 Q. And that is one of the reasons that
14 Askarel was such a desirable fluid for use in
15 transformers?

16 A. That is one of them, yes.

17 Q. Not only did it have low flame
18 properties, not only were the dielectric properties
19 desirable but the fluid was not subject to change
20 under normal operating conditions.

21 A. That is correct.

22 Q. And therefore had a very long life, long
23 useful life.

24 A. That's correct.

25 Q. And it is that long useful life of the

1 property that in another sense causes it to persist in
2 the environment, it is not subject to change as other
3 components are. Is that fair?

4 A. I have a hard time relating the
5 environment with the many forces at play that are
6 available compared to a fluid that's in a sealed
7 container and about the only stress it undergoes is
8 internal arcing, there's no oxygen, no bacteria, no
9 other chemicals so I have a hard time comparing the
10 two. They're different.

11 Q. Would it be fair to say that Monsanto
12 recognized for as long as you had been aware that the
13 chemicals in Askarel had to be properly disposed of
14 whatever the standard for proper disposal was?

15 A. Yes.

16 Q. And that that was information
17 communicated to the customers of Askarel?

18 A. Yes.

19 Q. And intended to be communicated to the
20 customers of the customers of Askarel, be it General
21 Electric's customers --

22 A. That was my understanding, yes.

23 Q. Were directions for proper disposal
24 routinely communicated to customers of Monsanto?

25 A. Will you help me with the definition of

1 routinely? Is this once a week or with each shipment?

2 Q. Okay. We have not talked about the
3 methods whereby Monsanto would communicate information
4 to its customers and that's probably unfair.

5 I am aware that most of the customers of
6 Monsanto for this particular product would be
7 customers of long standing. General Electric, I
8 assume that the business relationship between Monsanto
9 and General Electric persisted for a long time.

10 A. Yes.

11 Q. So in terms of communicating information
12 to General Electric it was unlikely that Monsanto
13 would treat every sale as if it were the only sale.

14 A. That's a fair assumption, yes.

15 Q. And the same would be true with
16 Westinghouse; correct?

17 A. Yes.

18 Q. But would it be, also be fair to say that
19 at some point during the relationship that existed
20 between Monsanto and customers of Askarel that one of
21 the elements communicated to the customer would be
22 that the product has to be properly disposed of?

23 A. Yes. That's one of the elements.

24 Q. And it would be intended by Monsanto that
25 the customer then communicate that information to its

1 customers or end users of the Askarel.

2 A. Yes.

3 Q. Is it also fair to say that for as long
4 as you had been with Monsanto the term proper disposal
5 of Askarel meant authorized landfill, up until the
6 time Monsanto put in place or put on line its
7 incinerator?

8 A. Yes. And then later on of course the
9 regulatory agencies laid down some more stringent
10 guidelines.

11 Q. Setting aside the advent of the
12 regulatory agencies would it be fair to say that
13 during your time with Monsanto proper disposal of
14 Askarel has always meant use of an authorized
15 landfill? And that would be so that we understand
16 each other a landfill that is proper under the
17 governing rules of the particular jurisdiction?

18 A. Yes. But there was a period there where
19 with the availability of incinerators, not only
20 Monsanto's but commercial units, where the advice was
21 strongly if it's a liquid you take it to an
22 incinerator and only landfill solid waste contaminated
23 with PCB's such as the saw dust that we used to clean
24 up or the dirty coveralls the worker used and so on.

25 Q. When did, approximately, the notion that

1 PCB fluids or fluids containing PCB should be
2 incinerated come in?

3 A. I would suggest that as far as Monsanto
4 was concerned it came in when we were able to
5 demonstrate that it was feasible to incinerate and
6 this happened in about the middle of 1970.

7 Q. When you say feasible to incinerate what
8 do you mean?

9 A. Well, up until then PCB's were looked
10 upon as fire resistant and it was assumed that
11 incineration might not be practical, might not be
12 doable, it's only when our laboratories start working
13 with different conditions of incineration they were
14 able to establish that indeed you can do it when you
15 reach the right temperature and the right amount of
16 oxygen and keep the material in those conditions for a
17 given period of time you can destroy it. So a burner
18 had to be designed to do those things which was
19 finally done in the middle of 1970 and Monsanto
20 constructed the first unit capable of destroying
21 PCB's.

22 Q. By combustion?

23 A. By combustion.

24 Q. Prior to that was it impossible to burn
25 Askarel? Or was it considered impossible to destroy

1 PCB's by combustion?

2 A. It was considered that PCB's would resist
3 combustion. This does not mean that someone out there
4 didn't do it almost unknowingly if the right
5 temperature was reached. But we found that anything
6 less than about 1,600, 2,000 degrees Fahrenheit would
7 not destroy all the PCB's.

8 Q. My understanding is that Askarel is not,
9 is Askarel uniformly PCB's?

10 A. No. Askarels contain in some cases
11 chlorobenzenes --

12 Q. Other components.

13 A. Other components.

14 Q. Now I understand when you're telling me
15 that it was determined that PCB's could not be
16 destroyed by combustion until the temperatures reached
17 1,600 to 2,000 degrees Fahrenheit but the question is
18 could Askarel be burned or do you know?

19 A. I can only speak for the PCB component,
20 unless that temperature was reached the chances were
21 it couldn't.

22 Q. And escape into the atmosphere.

23 A. Up the stack.

24 Q. But would there be components in the
25 fluid whatever they might be that would actually

1 combust, burn, as I would understand the term?

2 A. Yes. It is possible to have components
3 that burn at lower temperatures.

4 Q. So while you could incinerate Askarel in
5 the sense if it would burn you would not be
6 incinerating or combusting or destroying the PCB's
7 until you reached the desired temperature and
8 conditions that Monsanto discovered in 1970?

9 A. That is my understanding, yes.

10 Q. Beginning then between '70 and '71 the
11 recommendation would be if feasible to incinerate
12 Askarel in order to destroy the PCB's using a properly
13 designed and operating incinerator?

14 A. Yes.

15 Q. And if that was not available then you
16 would go to the authorized landfill.

17 A. Yes.

18 Q. Prior to 1970 would the directions to
19 customers then be to put it in an authorized landfill?

20 A. Yes.

21 Q. And then after 1970 or '71 Monsanto
22 offered its own incinerator for those customers that
23 chose to use it whenever yours went on line.

24 A. After our unit was in operation, yes.

25 Q. And for a fee you would burn stuff for

1 them.

2 A. Correct. And we were also in a position
3 to be able to point to commercial units that were
4 being erected or operated.

5 Q. Did you either personally or did Monsanto
6 after 1971 make specific recommendations for
7 particular commercial units?

8 A. After -- yes, starting about '72 or
9 thereabouts we were able to refer to units.

10 Q. How did Monsanto --

11 MR. HALL: Excuse me, we were able to do
12 what?

13 A. Refer to commercial units.

14 Q. (By Mr. Terry) How did Monsanto make the
15 determination that a commercial unit could be referred
16 to? Was there a certification process that you were
17 aware of? Did you make your own independent
18 assessment?

19 A. We made an assessment. I visited at
20 least two sites and had engineers with me and we
21 discussed the operation that was being offered and we
22 were satisfied that they had the resources, the
23 analytical laboratory and the unit to do the
24 incineration, that they could do a responsible job and
25 then we would be in a position to recommend that a

1 customer consider using those commercial units.

2 Q. Can you identify the commercial units
3 that you assessed and discussed?

4 A. There was one up in Blasdel, New York,
5 up near Niagra, and there was another unit outside
6 Philadelphia in Gloster City. The one in New York I
7 think was operated by Chem-trol, C-h-e-m, dash,
8 t-r-o-l, and the one outside Philadelphia was the
9 Rollins unit as I remember.

10 Can I take a break?

11 Q. Sure.

12 (RECESS TAKEN BY PARTIES.)

13 Q. (By Mr. Terry) Do you remember if there
14 were any other commercial incineration units that
15 Monsanto would recommend by name other than Chem-trol
16 and Rollins?

17 A. In time we were able to recommend a unit
18 up in Chesterfield, Illinois, I believe it was
19 operated by a company known as Nuclear Engineering.
20 Then the Pearl Company was able to start units in
21 Baton Rouge, Louisiana and in Deer Park, Texas.

22 Those are the only commercial units that
23 come to mind at the moment.

24 Q. It would be accurate to say that for so
25 long as Ascholor was sold for use in transformers that

1 there would be spent or scrap Ascholor?

2 MR. HALL: You you mean Askarel?

3 Q. (By Mr. Terry) Askarel, I'm sorry.
4 Askarel.

5 A. It was understood that after the liquid
6 served its useful function and could no longer do it a
7 decision had to be made whether it should be retreated
8 and try to recycle it or it was untreatable and had to
9 be disposed of. We understood that there would be
10 occasions when there would be material that had to be
11 disposed.

12 Q. Was it known -- excuse me.

13 (DISCUSSION HELD OFF THE RECORD.)

14 (WHEREUPON REPORTER READ FROM THE RECORD AS DIRECTED).

15 Q. (By Mr. Terry) Were you aware that there
16 would be PCB's or Askarel in solid scrap?

17 A. Certainly.

18 Q. And that the solid scrap had to be
19 handled in such a way that the PCB's were extracted
20 before disposal of the solid scrap.

21 MR. HALL: Did you say extracted?

22 MR. TERRY: Yes.

23 A. I'm not aware of any requirement in that
24 period of time in which solid material, an example
25 being saw dust with PCB's in it, had to be extracted

1 before you could dispose of the saw dust.

2 Q. (By Mr. Terry) I'm thinking in terms of
3 transformer, if a transformer was going to be scrapped
4 the liquids had to be extracted before the transformer
5 was scrapped; is that right?

6 A. I am not familiar with the procedure used
7 in the scrapping salvaging operation. I'm aware that
8 the unit has to be drained and all the free fluid
9 collected and I'm aware that there are metals inside,
10 steel core and core windings and then occasionally
11 there are either plastic or wood blocks to support the
12 internal parts.

13 I forgot your question now.

14 Q. Okay. In connection with scrapping of
15 transformers were you of the opinion that the fluids
16 would be drained from the transformer before it was
17 scrapped?

18 A. You mean the user of the unit before he
19 transferred it to the salvage yard would drain it?

20 Q. Without discussing who was responsible
21 for draining the fluids.

22 A. Eventually if you're going to get to the
23 inside it has to be drained.

24 Q. And that the fluids inside the
25 transformer had to be treated as an industrial

1 chemical in terms of the method that they should be
2 disposed.

3 A. That is correct.

4 Q. And that the same procedure for disposing
5 industrial chemicals had to be followed for the fluid
6 extracted from the transformer when it was scrapped.

7 A. Yes.

8 Q. Now --

9 MR. HALL: Excuse me. Would you mind
10 reading that last question back please?

11 (WHEREUPON REPORTER READ FROM THE RECORD AS DIRECTED).

12 Q. (By Mr. Terry) In terms of the method of
13 disposing of transformers, the proper method of
14 disposing transformers, Monsanto would not instruct
15 manufactures of transformers how to do that would you?

16 A. No. We were not in a position to offer
17 any advice along those lines.

18 Q. But Monsanto did instruct people on how
19 to dispose of the fluids.

20 A. Of the PCB's.

21 Q. Okay. The PCB's that were a component of
22 the fluid.

23 A. In those units that had PCB's. There is
24 mineral oil also in transformers.

25 Q. I'm sorry, that was overly broad.

1 In terms of those transformers that used
2 PCB's or Monsanto fluid that contained PCB's you would
3 instruct on the proper disposition of the fluids.

4 A. To the customer of Monsanto, yes.

5 Q. When did you become aware that there was
6 a health hazard associated with PCB's?

7 MR. HALL: Do you mean when did Mr.
8 Pappageorge individually become aware of that?

9 MR. TERRY: Yes.

10 A. I was made aware that the material could
11 affect the health of people starting in about 1955
12 when my workers had to be certain that they didn't get
13 their hands in it and kept it there too long or to
14 breathe any fumes, those kinds of things. I was aware
15 that there can be a health effect.

16 Q. (By Mr. Terry) You mentioned two methods
17 of absorption, one would be skin contact and the other
18 would be inhalation.

19 A. That is correct. Because there's
20 ingestion also but that would be unlikely.

21 Q. Unlikely your workers would be eating it.

22 A. There was some concerns about dirty
23 hands, eating a sandwich or a candy bar.

24 Q. Other than accidental ingestion?

25 A. Right.

1 Q. Beginning in 1900 and 55 when you became
2 aware that there was a health hazard and that the
3 methods of absorption that you needed to be concerned
4 about were skin contact and inhalation what was the
5 nature of the health hazard that you were concerned
6 about?

7 A. Depends on the degree of exposure, how
8 much material. I was tuned in really to the early
9 warning symptoms that would prevent serious harms and
10 the early warning symptoms were two: the one relating
11 to breathing is the feeling in the chest similar to a
12 severe chest cold with coughing and painful breathing.
13 That tells me the worker was exposed to too many
14 fumes, he should have been wearing his respirator when
15 he's performing whatever it was he was doing.

16 The other early warning symptom was the
17 chapped skin effect, the skin looked like chapped
18 hands from having the skin exposed to PCB's. That
19 told me that the worker should have worn protective
20 gloves and -- if I paid attention to those two early
21 warning symptoms it would avoid any serious effect
22 with over exposures of greater magnitude.

23 Q. What did you understand the serious
24 effect to be?

25 A. The ultimate one of course is death,

1 liver damage. But that occurs at very, very high
2 exposure levels.

3 Q. Any other long term consequences of
4 exposure that you were aware of back in 1955?

5 A. Liver damage was the long term. There
6 was a secondary skin symptom that I personally never
7 saw and that's chloracne. That would have been
8 another checkpoint in terms of gauging over exposure.
9 But chloracne, I have the understanding that it's a
10 temporary condition, eventually when a worker is
11 withdrawn from that environment it clears up.

12 Q. Did you know in 1900 and 55 to '58 when
13 you were supervising the electricians whether or not
14 there were threshold limit values for PCB's?

15 A. Yes there were. In about '50's, yes.

16 Q. And did Monsanto have in place a system
17 for determining whether or not the workers were
18 exposed to threshold limit values?

19 A. We would check the amount of material --
20 and this has to do with amount in the breathing air --
21 we would check that on a random kind of basis by the
22 plant industrial hygienist and determine the amount of
23 PCB's in the air near the job site and unless the
24 practice is changed there was no need to remeasure it
25 as long as it was acceptable, low enough.

1 Q. So in your capacity as a supervisor you
2 would rely both on the industrial hygienist who
3 advised you that the air quality was satisfactory by
4 the then established threshold limit values and you
5 would watch your own workers to see if there were any
6 of these signs that you mentioned, chapped hands or
7 breathing difficulty?

8 A. Yes.

9 Q. When did you or do you have an opinion as
10 to whether or not PCB's are carcinogenic?

11 A. I have an opinion, yes.

12 Q. And what is that opinion?

13 A. My opinion is that they are not human
14 carcinogens.

15 Q. Are you aware of any studies that
16 indicate they are?

17 A. I have never read a report that describes
18 such a study for human effect.

19 Q. Do you have an opinion or has your
20 opinion about the health hazards associated with the
21 PCB's changed at all from 1955 to the present?

22 A. No.

23 Q. So as far as you are concerned the state
24 of information available concerning PCB's effect on
25 the health of human beings exposed to it has remained

1 pretty constant since 1955?

2 A. Yes.

3 Q. And so the information at least in your
4 opinion that is presently available about the health
5 effects on human beings from exposure to PCB's is the
6 same as it was in 1955?

7 A. Correct.

8 Q. And in 1955 Monsanto knew as much as it
9 knows now about the health effects on human beings
10 from exposure to PCB's?

11 A. I have a hard time with knowing as much
12 now. We know more because more studies have been done
13 but the effects noted from these studies have not
14 changed the original premises that were based on
15 fairly limited studies back in the '50's.

16 Q. Okay. So while the base data is much
17 larger now than it was then the conclusion in terms of
18 what health hazard is actually posed to human beings
19 from exposure to PCB's is the same now as it was then.

20 A. Yes.

21 Q. And the significance of the health hazard
22 from human beings exposed to PCB's is the same now as
23 it was back in 1955.

24 A. That's my understanding.

25 Q. Has the level of concern about health

1 hazards to human beings associated with PCB's changed
2 as far as you can tell?

3 MR. HALL: You mean generally or in
4 Monsanto or what?

5 Q. (By Mr. Terry) Well, I'm asking for your
6 perception and if you need to qualify it in terms of
7 generally or within Monsanto I can understand that.

8 A. The concern has always been there. I
9 don't know that we're any less concerned now or then.
10 We still say these are industrial chemicals, if abused
11 or misused you can hurt people, and if you follow our
12 instructions you will not see any health effects.

13 I don't know how else to put it.

14 Q. Okay. So at least as far as you
15 personally are concerned, or are aware, the level of
16 concern or worry about health hazards associated with
17 exposure to PCB's is the same within Monsanto now as
18 it was back in 1955?

19 A. Yes.

20 Q. Was that worry or concern about health
21 hazards associated with exposure to PCB's communicated
22 by Monsanto to its customers?

23 A. Well, the instructions regarding avoidance
24 of vapors and skin contact were based on that concern.
25 I don't know that the word concern itself appeared in

1 any communication to the customers.

2 Q. I appreciate the heading would not be by
3 the way we're really worried about this, but if a
4 corporation is concerned about health hazards they
5 would communicate adequate instructions for safe use
6 of the product, warning concerned with improper use
7 about what could happen to customers.

8 A. That's right. This reflects the concern.

9 Q. Did Monsanto do that?

10 A. Yes.

11 Q. And in your opinion were the instructions
12 Monsanto communicated to its customers for safe use of
13 the product adequate?

14 A. Yes.

15 Q. And had they been adequate since 1955?

16 A. Yes.

17 Q. Were the warnings communicated by
18 Monsanto of risks associated with improper use in your
19 opinion adequate?

20 A. Yes.

21 Q. And were they adequate from 1955 until
22 Monsanto ceased selling the stuff?

23 A. Yes.

24 Q. And this information would be
25 communicated by Monsanto to its customers.

1 A. Yes.

2 Q. And as that information pertains to PCB's
3 Monsanto would be aware that it was the primary source
4 of such information to its customers.

5 A. Yes.

6 Q. Because Monsanto was at least in this
7 country the sole supplier of PCB's.

8 A. Well I hesitate because there's some
9 indication that some PCB's were imported so can you
10 stick the word sole in there as the principle
11 supplier.

12 Q. I'm sorry. Within the continental United
13 States Monsanto was the sole domestic source of PCB's.

14 A. Correct.

15 Q. If there were any other PCB's
16 manufactured outside the country, imported into the
17 United States, you don't know particularly one way or
18 the other do you?

19 A. That is true.

20 Q. In terms of domestic supply, manufactured
21 in this country, Monsanto was the sole supplier?

22 A. As best as I could determine, yes.

23 Q. So in terms of information available,
24 instructions of safe use, warnings for the
25 consequences of improper use to the customers of

1 Monsanto as it relates to PCB's Monsanto would be the
2 primary source.

3 A. Yes.

4 Q. Would Monsanto anticipate that its
5 customers would communicate that information to end
6 users?

7 A. Yes.

8 Q. So that the end users would have the
9 information necessary to know how to use the material
10 properly and the risks associated with improper use as
11 it pertains to health hazards?

12 A. That was the intent, yes.

13 Q. In your opinion did Monsanto have a
14 responsibility to see to it that the end users of PCB
15 products had information concerning safe use and
16 warnings of the consequences of improper use?

17 A. No. I don't believe Monsanto was in any
18 position to assume that kind of responsibility not
19 being involved in the distribution, the designing
20 equipment, whatever else might have been added to it
21 after it left our plant.

22 Q. Perhaps I'm not making myself clear. I
23 do not mean to imply that I am asking you whether or
24 not Monsanto had the responsibility to deal directly
25 with the end users to communicate the information

1 because as we have discussed earlier you may not have
2 known who they were and your customers would rather
3 you not deal directly with their customers.

4 A. That's true.

5 Q. In terms of however Monsanto providing
6 information, instructions for safe use and warnings
7 concerning hazards to its customers and directing or
8 suggesting that its customers communicate that
9 information to the end users Monsanto recognized that
10 it was important that the end users had the
11 information; correct?

12 A. Certainly.

13 Q. And while you would not deal directly
14 with the end users Monsanto would take steps to see to
15 it that the information was available to your
16 customers and that they were urged to communicate it
17 to the end users.

18 A. That is true.

19 Q. Because when Monsanto as the sole
20 domestic supplier of PCB's recognized that they had
21 the responsibility for getting that information,
22 instructions and warnings, out to people.

23 A. That is true.

24 Q. And Monsanto relied on its customers to
25 communicate that information to end users.

1 A. Yes.

2 Q. Do you know or have an opinion as to
3 whether or not your customers did in fact communicate
4 that information to end users?

5 A. I have an understanding based on some
6 observations and comments that I was exposed to
7 through the years, I was personally involved in
8 reviewing documents, drafts of documents prepared by
9 General Electric and Westinghouse in which this kind
10 of information was mentioned. I have no way of
11 knowing what the final draft looked like but there's
12 every reason for me to believe that something close to
13 the draft I saw was mailed or sent or delivered to the
14 customers of those two Monsanto customers.

15 Other than those two definite examples I
16 do not have any information regarding what other
17 Monsanto customers relayed to their customers.

18 Q. Okay. When did you do this work that you
19 have described with GE and Westinghouse?

20 A. It was in 1970.

21 Q. Prior to your work with General Electric
22 and Westinghouse are you aware of anyone else within
23 Monsanto that did the same kind of thing with
24 customers? That is assist them in the preparation of
25 information?

1 A. I am personally not aware. That doesn't
2 mean it didn't happen. I don't know.

3 Q. Are you aware of any attempt made by
4 Monsanto to determine if the customers of your
5 customers, that is the end users actually dealing with
6 the PCB's, were receiving the information that you
7 communicated to your customers in terms of
8 instructions for safety, use and warnings for the
9 consequences of improper use?

10 A. I do not know.

11 Q. Would you agree with me that it was
12 reasonably foreseeable for Monsanto that the end users
13 of the PCB's would need information about safe use or
14 warnings about the consequences of improper use?

15 A. Well, it depends on the situation. I can
16 see where if our customer, if Monsanto's customer --

17 Q. I'm sorry, you're getting ahead of me.
18 I'm not asking about, I'm not asking you to evaluate
19 at this particular time right now whether or not the
20 customer, Monsanto customer, is actually communicating
21 or failing to communicate information.

22 A. I understand.

23 Q. Would you agree with me that Monsanto
24 could foresee that it was necessary for the end user
25 to have information about safe use, warnings for

1 improper use without regard to source?

2 A. That would depend. There are situations
3 where the supplier of the electrical equipment also
4 provides services so that the ultimate owner of that
5 piece of equipment has nothing to do with it.

6 Q. Like the Holiday Inn fellow.

7 A. Yes.

8 Q. Okay.

9 A. The GE Corporation has roving teams of
10 service people that pull up to the unit and do what's
11 appropriate. So I can see where the Holiday Inn
12 manager has nothing to do with that transformer
13 sitting outside the room that you're occupying.

14 Q. Apart from situations where the end user
15 is closer to a consumer as I would be a consumer of
16 electricity, and I don't have any earthly idea of what
17 happens on the other side of the wall plug, have
18 never, ever looked, of course it scarce me to death,
19 but in terms of a consumer, apart from an end user
20 who's essentially a consumer, there are other end
21 users who are not, who actually deal with the
22 equipment themselves. You understand that?

23 A. Yes.

24 Q. That class of end user who actually deals
25 with the equipment itself, for that class of end user

1 is it fair to say that Monsanto was aware that that
2 class of end user needed information about
3 instructions for safe use or clarification for the
4 consequences of unsafe use of PCB's?

5 A. Yes.

6 Q. And Monsanto realized that the primary
7 source of that information was itself.

8 A. Yes.

9 Q. And Monsanto made the decision to rely on
10 its customers to communicate that information.

11 A. Yes.

12 Q. Monsanto was aware that that kind of
13 information was necessary not only for the equipment
14 containing PCB's while in operation but that kind of
15 information was necessary for disposal of PCB's.

16 A. Yes.

17 Q. And again Monsanto made the decision to
18 communicate that information to its customers and
19 relied on them to communicate it to the end users.

20 A. Yes.

21 Q. We have before us some literature --

22 (DISCUSSION HELD OFF THE RECORD.)

23 (LUNCHEON RECESS TAKEN BY PARTIES.)

24 Q. (By Mr. Terry) Mr. Pappageorge, you were
25 identified by Monsanto as a person that I should

1 request to take the deposition of and in connection
2 with that I served on the attorneys from Monsanto a
3 subpoena duces tecum or a request that certain
4 documents be provided.

5 Did you personally have anything to do
6 with the assembling of the documents that have been
7 provided?

8 A. No.

9 Q. I had asked Monsanto to produce all
10 documents relating to directions, instructions and/or
11 warnings supplied by Monsanto Company to customers,
12 known users and others concerning use, disposal of and
13 health hazards associated with the use and disposal of
14 dielectric fluids such as Askarel containing PCB's
15 from 1930 to the present. And this is the material
16 that they gave me. Okay?

17 A. Okay.

18 Q. Can you find for me the warnings and
19 instructions connected with disposal that Monsanto
20 supplied customers?

21 A. I'll try.

22 Q. Okay.

23 A. (Reviewing Document).

24 Q. And by the way so the record is clear, by
25 this material it is the material that the court

1 reporter has previously marked as discovery exhibits
2 to your deposition.

3 A. (Reviewing Document).

4 MR. HALL: Mr. Terry, to be sure that
5 you're clear on this and I'm clear on it it's my
6 understanding that these documents were produced to
7 you by Mr. Ben McDonald; is that correct?

8 MR. TERRY: May we go off the record?

9 MR. HALL: Sure.

10 (DISCUSSION HELD OFF THE RECORD.)

11 (WHEREUPON REPORTER READ FROM THE RECORD AS DIRECTED).

12 A. I've looked through the -- wait a minute,
13 I've got to look through these yet. (Reviewing
14 Document).

15 In response to your question I have
16 looked through the documents that have been submitted,
17 I find no specific reference to the use of authorized
18 landfills. I do find in a few of these documents the
19 cautionary words that convey to the reader the fact
20 that these materials should not be introduced into the
21 environment. Those words appear on the copy of the
22 label, Exhibit --

23 Q. (By Mr. Terry) Would you pull out the
24 ones where you find the words sir?

25 A. All right.

1 Q. You don't have to tell me what they are
2 yet, just pull them out and set them aside.

3 A. All right.

4 These are the documents that I see.

5 Q. The first one you have identified as
6 Discovery Exhibit No. 5 which is a letter from you
7 entitled Dear Sir. And I assume that you're making
8 reference to the statement:

9 "We wish to strongly re-emphasize with
10 you the importance of avoiding direct or
11 accidental PCB contamination of feed, food
12 and packaging material and of preventing
13 PCB's from escaping into the environment."

14 A. Yes.

15 Q. And this was a letter prepared by you in
16 April, 1900 and 72?

17 A. Yes.

18 Q. To whom was it given?

19 A. To all customers on record with Monsanto
20 for the previous three year period or more.

21 Q. You make reference to extreme care as
22 taken in the handling, use, storage and disposal of
23 these materials in this letter.

24 A. I do.

25 Q. Prior to 1900 and 72 had Monsanto ever

1 delivered to its customers that kind of direction or
2 warning?

3 A. Yes.

4 Q. When?

5 A. Starting in 1970 as best I recall.

6 Q. And how was that done?

7 A. There was a letter addressed to the
8 customers on record mailed in February of 1970 and
9 starting in May of 1970 that information was included
10 on the labels of the products.

11 Q. But the letter from 1970, the other one
12 is not here?

13 A. I have not seen it here, no.

14 Q. Nor are the labels that contain the same
15 directions?

16 A. There's a copy of a label here.

17 Q. Okay. We'll get to those later.

18 Were there any directions or
19 amplification or instructions given in connection with
20 the use of the term extreme care and disposal or any
21 reference to any accepted procedure or protocol for
22 extreme care and disposal?

23 A. No. That was left up to the judgment of
24 the owner of the liquid and his resources.

25 Q. Just use extreme care to avoid letting it

1 into the environment.

2 A. Right.

3 Q. Anything in that letter that indicates
4 that extreme care should be used in disposal to avoid
5 injury or risk of injury to humans?

6 A. Not in those words, no.

7 Q. Any suggestion or indication that
8 improper disposal can result in injury to humans?

9 A. In this letter?

10 Q. Yes.

11 A. No.

12 Q. But it is true that improper disposal can
13 result in injury to humans?

14 A. Coupled with other actions by humans.
15 It's not just the disposal itself, something else must
16 take place to get the human in contact or exposed.

17 Q. But if the term improper disposal
18 includes disposal other than as is proper for an
19 industry chemical or other than is proper for PCB's
20 there is a risk of exposure to humans is there not?

21 A. There is a risk. I don't know how to
22 measure it.

23 Q. And when you have that risk of exposure
24 of the PCB's to humans there is a risk of injury. Is
25 there not?

1 A. Yes.

2 Q. So it is fair to say that it is
3 foreseeable to Monsanto that if the material is
4 improperly disposed of there is a risk of injury to
5 humans.

6 A. Yes. As I said but I don't know how you
7 would measure that. The risk is not in my opinion
8 great.

9 Q. I understand that you may quantify it as
10 a slight risk but there is a risk is there not?

11 A. Yes.

12 Q. And it is fair to say that it is
13 reasonably foreseeable to Monsanto that if the
14 material they sell is not properly disposed of that
15 there can be people who are hurt.

16 A. It's possible.

17 Q. And that is one of the reasons that you
18 advise your customers to dispose of the material
19 properly.

20 A. That's yes, one of the reasons.

21 Q. You have also selected Discovery Exhibit
22 No. 8 and folded it open to Page 18.

23 A. Yes.

24 Q. What is Discovery Exhibit No. 8?

25 A. This is a copy of a product bulletin, the

1 title, The Aroclor Polychlorinated Polyphenyls.

2 Q. What is the date that was prepared?

3 A. As best as I can tell it's August, '71.

4 Q. Is there an earlier publication that
5 accomplished the same result?

6 A. There were publications describing the
7 use of these materials as dielectrics, some of them
8 we've looked at here. (Indicating). But there was no
9 publication that was exactly in the composition as
10 this document. This is a little more detailed.

11 Q. So the document that we are looking at is
12 not an update of an already published document.

13 A. Not to my knowledge, that's correct.

14 Q. But represents a new document created by
15 Monsanto in 1971.

16 A. Yes.

17 Q. And it did not, so that I understand, it
18 did not replace an existing document that you were
19 using for the same purpose.

20 A. That is correct.

21 Q. Now what is it on Page 18 that you had
22 referred to?

23 A. Page 18 is devoted to the, subject matter
24 at the top: Proper Handling Of PCB's By The
25 Electrical Industry To Avoid Environmental

1 Contamination.

2 Q. May I see that?

3 A. Sure. (Indicating).

4 Q. Are you referring to the entire substance
5 of this page?

6 A. As far as the title I just read, yes.
7 And I'm referring in terms of proper disposal the
8 precautions are here.

9 For example the fourth paragraph down it
10 starts off:

11 "Therefore it's essential to do all that
12 is possible to avoid environmental
13 contamination with PCB's."

14 The next paragraph:

15 "PCB's must not be introduced in any
16 waters or marine areas. Spills or leakage
17 must be contained."

18 Then it goes on to describe the
19 availability of incineration for liquid waste and then
20 -- that's about it.

21 Then it says call Pappageorge if you have
22 questions.

23 Q. And this would be distributed to the
24 customers?

25 A. Yes.

1 Q. And that, the reference to the
2 incinerator is, at the time of that publication you
3 have your incinerator on line and you will take care
4 of used fluids for customers.

5 A. True.

6 Q. At the rate of three cents per pound.

7 A. At that point yes, three cents.

8 Q. Isn't that what it says there?

9 A. (Reviewing Document). Yes. It does.

10 Q. Any specific directions in that discovery
11 exhibit that you're looking at about how the customer
12 is supposed to dispose of used fluids containing PCB's
13 if they don't send it to Monsanto?

14 A. Well there is the reference to, the
15 expression several others provide facilities for
16 proper incineration and destruction so that would
17 indicate that there are other incinerators in addition
18 to Monsanto available.

19 Q. And they would be the two that you
20 identified earlier, I assume, Chem-trol in New York
21 and Rollins?

22 A. Those two come to mind. There may have
23 been others that I don't remember.

24 Q. Anything else that tells, in that
25 instrument, that tells the customer what he's supposed

1 to do with used fluids if he doesn't send them to
2 Monsanto?

3 A. That's all it says.

4 Q. Just don't let it into the environment.

5 A. Correct.

6 Q. You also pulled Discovery Exhibit No. 3
7 which says that Monsanto will burn it at the rate of
8 three cents per pound.

9 A. Yes.

10 Q. Then you have -- anything else in there
11 about disposal on that exhibit?

12 A. That's it.

13 Q. You gave me Discovery Exhibit No. 4 which
14 again says you all will burn it at the rate of three
15 cents per pound.

16 A. And also includes the reference to --
17 well, the sentence we talked about earlier, extreme
18 care should be taken to avoid entry, it's on that
19 label.

20 Q. When was that published?

21 A. This label? '71.

22 Q. And you gave me No. 2 which I assume is
23 the same.

24 A. It's the same except that No. 2 was used
25 with No. 3 because the incineration statement was not

1 imprinted on this label.

2 Q. And it is on this.

3 A. It is on the subsequent printing.

4 Q. Okay. Anything that you can show me that
5 predates 1971 where Monsanto gave directions to its
6 customers about proper disposal?

7 A. I don't see them here and as I said
8 earlier I vividly recall reading some bulletins in the
9 1950, 1960 time frame but I just do not remember the
10 specific time nor the specific bulletin. But there
11 were references to, I remember a reference that's
12 implied, don't just spill this in the back yard kind
13 of statement, those aren't the exact words. There
14 were references to proper disposal in authorized
15 landfills, I remember those very vividly.

16 Q. Now do you know where those are today?

17 A. I can only assume they're at the law
18 department at Monsanto as the custodian of those
19 documents if they're still around. I don't know.

20 Q. The documents that you remember seeing
21 that are not here today, do you know to whom they were
22 given?

23 A. Just like the documents we saw, they were
24 given to the customers of Monsanto either by the sales
25 representative or by direct mailing or when they

1 visited the offices of Monsanto or their clients they
2 would be given copies unless they already received
3 one.

4 Q. Is it your testimony and can you testify
5 that publications that Monsanto has not produced
6 contained instructions about proper disposal of fluids
7 containing PCB's manufactured by Monsanto and were in
8 fact delivered to customers?

9 A. That's my understanding, yes.

10 Q. Do you have any personal knowledge that
11 that occurred?

12 A. Can you help me with the word personal?

13 In other words did I give the document to
14 a customer? No.

15 Q. For example did you say to the field
16 representatives make sure they get this or did you
17 participate in the training courses that said listen,
18 you guys make sure that the customer gets this. We
19 are concerned about these fluids escaping into the
20 environment, make sure then proper disposal is
21 required. Did you do anything like that?

22 A. I did all of those things starting in
23 1970.

24 Q. I understand that.

25 A. But prior to that I was not involved.

1 Q. Do you understand that that was done by
2 others?

3 A. That is my understanding.

4 Q. Who might those others be that would do
5 that?

6 A. Well certainly all the field salesmen and
7 there were many, many of those. Mr. Benignus was the
8 key individual in all of this. I would suggest that
9 he might have even been the author of such a document
10 that I have in mind.

11 I don't know what else to add except that
12 in my involvement with the activity and Mr. Benignus I
13 was left with the vivid understanding that these
14 materials were supposed to be responsibly handled. At
15 no time was anybody instructed to dump it down the
16 sewer for example.

17 Q. Now in the material that you did extract
18 from the documents produced by Monsanto that we have
19 identified and set apart in a separate pile, in those
20 materials it is apparent that Monsanto is concerned
21 that the customers use extreme care in proper
22 disposal.

23 A. That is the intent behind the statement,
24 yes.

25 Q. And in fact the words extreme care are

1 used.

2 A. Right.

3 Q. And I understand from our earlier
4 discussion that the same level of concern that existed
5 after 1971 existed before; is that correct?

6 A. Not quite. Until Monsanto had
7 information that PCB's could be an environmental
8 problem the material was perceived to be typical of
9 many industrial chemicals, treated with respect but it
10 doesn't require the extreme care, the terminology we
11 finally used after we learned more about presence in
12 the environment and potential harm to the environment.

13 Q. Would it be fair to say then that the
14 information communicated in 1970 or '71 represented a
15 departure from the information communicated earlier?

16 A. Yes. It was a departure.

17 Q. Did Monsanto have more concern about
18 PCB's after 1970 than they had had earlier?

19 A. Certainly.

20 Q. And was that heightened concern
21 communicated to customers?

22 A. Yes.

23 Q. When did Monsanto become aware that it
24 was necessary to communicate to its customers
25 heightened concern?

1 A. I would suggest -- this is an evolving
2 kind of concern -- so I would suggest that it became a
3 consensus of the managers in Monsanto in late 1969 and
4 was accomplished by the February, 1970 letters.

5 Q. What was it that had caused this change
6 in the level of concern in 1969?

7 A. It was the identification of some of the
8 PCB's by reputable laboratories of small amounts of
9 PCB's in the environment in samples that were not
10 necessarily industrially related which was totally new
11 to Monsanto. We didn't expect that an industrial
12 chemical would end up in pine needles in Sweden for
13 example or in infants' hair in Stockholm where the
14 initial studies took place. Followed by that report
15 we got reports that some birds -- now these were
16 allegations as distinguished from proven scientific
17 data -- that some birds were being harmed by PCB's and
18 that their reproduction was being affected. That was
19 covered by several laboratories in '68, '69, '70.
20 Later it was demonstrated it was DDT that was the
21 culprit but not PCB's but anyway in 1970 we assumed
22 PCB's were the culprit therefore it heightened our
23 concern.

24 There were reports that fish were taken
25 out of the Great Lakes and analyzed and PCB's were

1 found. There it was a matter of presence, there was
2 no reported connection between a harm and presence.
3 There was a report out of the Government laboratories
4 in Gulf Breeze, Florida that tests with juvenile
5 shrimp, young shrimp, showed that they were very
6 sensitive to PCB's in the water.

7 It's that kind of information that
8 heightened the concern on the part of Monsanto.

9 Q. Would it be fair to characterize that
10 kind of information as information that there was a
11 level of PCB's in the environment generally as apposed
12 to confined to industrial locations?

13 A. I don't know that PCB's have been --

14 Q. I'm not saying --

15 A. -- determined as generally present.

16 There are spots. In most cases these spots I'm going
17 to call them are associated with industry. There are
18 a few examples like those I mentioned in Sweden that
19 we've never been able to associate with industry,
20 where one can speculate where the PCB's came from.

21 Q. Now the first report you mentioned was
22 the one coming out of Sweden that reported the
23 presence of PCB's in samples of human tissue or hair.

24 A. That was one of their studies, yes.

25 Q. That came to the attention of Monsanto

1 about 1968 or '69?

2 A. Let me think. I'm going to say 1967.

3 Q. Prior to the study from Sweden that came
4 to the attention of Monsanto in 1967 had Monsanto
5 received, to your knowledge, any information from any
6 source indicating the presence of PCB's in an
7 unexpected place?

8 A. No.

9 Q. The reports that you identified about the
10 birds, those were eventually determined to be the
11 result of exposure to DDT.

12 A. Yes.

13 Q. But the other reports that you mentioned,
14 the one coming out of the Great Lakes and the young
15 shrimp in Florida, those are PCB's.

16 A. Yes.

17 Q. Did those reports indicate the presence
18 of PCB's in the fish or in the water? In the shrimp
19 or in the water?

20 A. The Great Lakes samples were PCB's in the
21 fish. No one could tell us where the fish had been,
22 up what streams and found their way into the Great
23 Lakes. No one knew what the fish had been exposed to.
24 The shrimp were done in a laboratory setting where the
25 water was deliberately contaminated and I guess the

1 shrimp have eggs or whatever it is, anyway they
2 hatched the young shrimp and the young shrimp didn't
3 survive.

4 Q. The study on the Great Lakes, the fish,
5 about when was that that it came to the attention of
6 Monsanto?

7 A. We started hearing about those in 1969.
8 And there was a meeting held in Duluth, Minnesota in
9 March of 1970 at which all this was summarized.

10 Q. On the basis of information available to
11 Monsanto beginning in 1967 until 1900 and 70 of the
12 same character as the studies that you have identified
13 coming out of Sweden and the fish in the Great Lakes,
14 did Monsanto conclude it was necessary to advise its
15 customers to use extreme care in disposal?

16 A. That was an important factor, yes.

17 Q. Why did you conclude from studies in
18 Sweden and Great Lakes fish to advise customers to use
19 extreme care in disposal?

20 A. Well, we wanted to make certain that the
21 materials were handled responsibly and we believed by
22 using strong language like the use of the word extreme
23 was more likely to get the attention of the reader of
24 the label or the memoranda that he received and we
25 felt that this was one way to communicate and get some

1 responsible, favorable behavior, on the part of the
2 customer.

3 Q. Did you conclude or assume that improper
4 disposal or irresponsible handling had resulted in
5 contamination evidenced by the study in Sweden and the
6 fish in the Great Lakes and others?

7 A. We frankly speculated that it was the
8 PCB's that got out of control, that found their way
9 into these samples. Just which use contributed the
10 PCB's to the environment we at that time really didn't
11 know. So we felt that advising everyone who bought it
12 from us to do whatever they could to prevent it
13 getting in the environment would be a responsible and
14 important first step to controlling further
15 contamination of the environment.

16 Q. Did Monsanto conclude that improper
17 disposal was a likely or probable cause of
18 contamination in the environment as reflected by the
19 study in Sweden and the Great Lakes fish?

20 A. The study in Sweden was very difficult
21 for us to evaluate primarily because some of the
22 samples like those I talked about earlier we could not
23 associate with an industrial application and we really
24 didn't know enough about the Swedish industries to
25 make even a reasonable guess.

1 The Lake Michigan we did speculate that
2 some of those PCB's must be coming from some factory
3 somewhere. Not necessarily right up close to the
4 Great Lakes but on some water system that eventually
5 ended up in the Great Lakes.

6 Another thought was that the use in what
7 we eventually called the open uses, when finally
8 disposed and I have in mind as an example the
9 carbonless copy paper, when it hit the waste basket
10 and was sent to say a city incinerator we speculated
11 and to this day have no real scientific data that much
12 of the PCB's went up the stack into the atmosphere,
13 carried around the world almost and then rains, it
14 ends up in the pine forests of Sweden and this is how
15 it's conceivable that the pine needles shows a PCB.

16 I would emphasize this is all
17 speculation. No studies have ever been designed to
18 demonstrate this.

19 Q. I understand from your answer that
20 Monsanto concluded that if a product containing PCB
21 were incinerated in a normal fashion, in a regular
22 incinerator for paper for example, that that kind of
23 combustion would be inadequate to combust the PCB's.

24 A. That is correct.

25 Q. Because that kind of incineration would

1 not have the temperature, 1,600 degrees to 2,000
2 degrees Fahrenheit you mentioned.

3 A. Not normally.

4 Q. Probably not have the specific conditions
5 that Monsanto determined were necessary for
6 combustion.

7 A. That is correct.

8 Q. So normal incineration the PCB's would
9 simply go up the exhaust stack and be disbursed.

10 A. That's my understanding.

11 Q. It would appear to me then that Monsanto
12 concluded that improper disposal of PCB's was a likely
13 or probable explanation for PCB contamination found in
14 the place where you would not otherwise expect it.

15 A. Yes.

16 Q. And as a result Monsanto modified the
17 information communicated to customers who dealt with
18 PCB's.

19 A. Yes.

20 Q. Used the term extreme care as apposed to
21 care for example?

22 A. That's an example, yes.

23 Q. Would you agree with me then that the
24 instructions given before 1970 were not adequate?

25 A. Were not adequate for preventing PCB's

1 getting into the environment.

2 Q. Were not adequate to communicate to the
3 users the necessity for proper disposal of PCB's?

4 A. Well I have trouble with the word proper.
5 The word proper in 1960's was different than it is
6 today. The technology has changed, the knowledge has
7 changed.

8 Q. But with respect to Askarel the
9 technology has not changed beyond the use of an
10 incinerator designed by Monsanto; correct?

11 A. True. But the incinerator was not
12 available in the '60's.

13 Q. Right.

14 A. So we had to say use a landfill.

15 Q. That's right. And after 1970 to the
16 customers of Askarel you said use extreme care.
17 Correct?

18 A. To prevent it entering the environment.

19 Q. Right. Use extreme care in disposal;
20 correct?

21 A. And use, handling, all the steps.
22 Shipping. Extreme care every step.

23 Q. But with respect to disposal Monsanto
24 elected to exchange the information communicated and
25 said now, beginning in 1970, they said use extreme

1 care did they not?

2 A. True. But not just disposal now.

3 Q. I understand that.

4 A. I know you're interested in disposal but
5 this applied to every step of the process of
6 manufacturing, shipping, using, and finally disposal.

7 Q. On the basis of that is it fair to
8 conclude that in 1970 Monsanto concluded that the
9 level or the kind of instructions given at that time
10 were not adequate?

11 A. For which period of time?

12 Q. Prior to 1970. Did you conclude that the
13 instructions you were then giving were not adequate
14 and needed to be changed?

15 A. They were adequate to satisfy the
16 knowledge available at that time.

17 Q. Why did you change them then?

18 A. Because new information came by that told
19 us review your practices and as we reviewed them we
20 decided more must be done. You can only act on
21 information. If there was no information in 1960 that
22 PCB's were a problem disposal and landfill is still
23 responsible, perceived to be responsible.

24 Q. Disposal in an approved landfill is still
25 responsible isn't it?

1 A. Not today I don't believe, no.

2 Q. Was it in 1970?

3 A. 1970? From Monsanto's viewpoint it was
4 limited to those materials that could not be
5 incinerated. In other words none liquid waste could
6 be sent to a landfill.

7 Q. But the liquid waste had to be
8 incinerated?

9 A. That was our strong recommendation. We
10 had no authority to enforce it.

11 Q. Where was that strong recommendation
12 communicated to the customers? Because the only thing
13 I've seen so far is Monsanto says we'll burn it if you
14 want at three cents a pound. Where was the strong
15 recommendation communicated to the customer?

16 A. I know I've told many a customer over the
17 phone, I know I wrote many a memo or letter in
18 response to a question in which I indicate that, the
19 conditions of burning and so on. I recall putting
20 together a document in which it listed some thoughts I
21 had on how to handle liquid waste, solid waste -- I
22 forget the third category, just some suggestions as
23 sort of a guideline to disposal.

24 Q. Where is the guideline to disposal? Do
25 you know?

1 A. I don't know where it is today.

2 Q. Was it communicated to customers?

3 A. Yes.

4 Q. Which customers was it communicated?

5 Those that asked or all of them?

6 A. I'm sorry?

7 Q. Who got the guidelines to disposal?

8 A. I can't tell you specifically but I do
9 know that stacks of these were sent to the field
10 representatives and he would as he made his calls
11 leave them. I do know that we went some in response
12 to self calls and letter inquiries. I don't remember
13 if a general mailing was made. I don't remember.

14 Q. And you prepared the guidelines to
15 disposal?

16 A. Yes.

17 Q. And when did you do that?

18 A. I'm going to say 1971.

19 Q. Had there been any prior guidelines to
20 disposal that you're aware of?

21 A. Not of that type, no.

22 Q. Of any type dealing with PCB liquids?

23 A. As I said earlier I recall some bulletins
24 describing the Askarel use in which reference was made
25 to disposal in authorized landfills. That's the

1 closest thing that I recall that resembled a guideline
2 to disposal.

3 MR. TERRY: Mr. Hall, may I speak with
4 you for a moment?

5 MR. HALL: Sure.

6 (DISCUSSION HELD OFF THE RECORD.)

7 Q. (By Mr. Terry) I'm trying to ask you to
8 recreate for me the thought process that you and other
9 individuals in the company went through that led to
10 this change in emphasis that is identified in the
11 exhibits that we do have. Are you with me?

12 A. I think I am, yes.

13 Q. Where you went from care in disposal to
14 extreme care in disposal. Okay?

15 A. Yes.

16 Q. Now it would appear to me from that that
17 it was decided that the disposal of fluids containing
18 PCB's was not being done well enough or may not have
19 been done well enough that disposal of fluids
20 containing PCB's was a likely or probable explanation
21 for the presence of PCB's in the environment that you
22 were learning of at that time. Is that a fair
23 statement?

24 A. Yes. When you say probable source, yes.

25 Q. And you and I had discussed earlier and I

1 am aware that Monsanto did not conduct an
2 in-department investigation to determine the disposal
3 practices of the ultimate users of fluids containing
4 PCB's; correct?

5 A. That is correct.

6 Q. But Monsanto did make a determination
7 that it was necessary to emphasize more strongly than
8 they had in the past the necessity for proper disposal
9 of fluids containing PCB's.

10 A. Starting in 1970, yes.

11 Q. Is it fair to say that Monsanto made the
12 decision then that the instructions for disposal and
13 the warnings of risks associated with improper
14 disposal were not, that were being given at the time,
15 prior to the change, were not adequate to accomplish
16 the desired result, proper disposal?

17 A. Based on our new knowledge they were not
18 adequate.

19 Q. Would it be fair to say that in your
20 opinion the information that had been communicated
21 earlier was sufficient information to result in proper
22 disposal but simply lacked emphasis?

23 A. That is a highly probable contribution to
24 the PCB's being found in the environment is this lack
25 of emphasis, it's a highly probable source of the

1 problem.

2 Q. All right. Now this lack of emphasis on
3 proper disposal techniques, do you have an opinion as
4 to whether or not generally speaking users of
5 industrial chemicals did not properly dispose of
6 chemicals?

7 A. I'm in no position to know all of the
8 industrial chemical users. I can accept the concept
9 that there were some that did not handle industrial
10 chemicals in a manner I would call responsible. It
11 would not surprise me if some of that did not go on.

12 Q. Do you have an opinion as to whether or
13 not if the fluids containing PCB's used by or used for
14 transformers had been properly disposed of in
15 accordance with accepted practices existing from '55
16 to '70 that those practices would have prevented the
17 PCB's contained in those fluids from escaping into the
18 environment generally?

19 A. Yes.

20 Q. And what is that opinion?

21 A. I'm sorry, you said that the practices --

22 Q. The question was do you have an opinion
23 and you said yes.

24 MR. HALL: You do have an opinion, he's
25 asking what is the opinion.

1 Q. (By Mr. Terry) I'm sorry, I remember the
2 beginning of the question.

3 A. If the user of these Askarel fluids
4 containing PCB's had exercised practices or handled
5 the material as we do for industrial chemicals
6 generally PCB's would not have entered the environment
7 to the extent that there would be an effect noted and
8 unless the sample is taken very, very close to the
9 site the chances are in my opinion they would not have
10 been detected in the general environment.

11 Q. Do you have an opinion as to whether or
12 not burning or causing the combustion of Askarel fluid
13 in any matter other than the Monsanto incinerator
14 variety effectively destroys the PCB's; burns them,
15 combusts them?

16 A. I have an opinion, yes.

17 Q. And what is that, sir?

18 A. It is my considered opinion that exposing
19 PCB's to temperatures less than the 1,600, 2,000 range
20 we talked about earlier and without enough oxygen
21 present and without keeping the material at that
22 temperature for the time period required, I would
23 suggest that a few of the PCB's might be destroyed,
24 especially those with very little chlorine attached
25 but the majority of the PCB's would be evaporated,

1 volatilized and would end up with the stack gasses.

2 Q. And go the same place.

3 A. Go out into the atmosphere and I don't
4 know where they'll end up then.

5 Q. But you wouldn't want to be downwind
6 would you?

7 A. Not voluntarily, no. Depends again on
8 the concentrations.

9 Q. And inhalation of PCB's that escape from
10 stack gasses in the manner that I have described is a
11 way to absorb or come in contact with PCB's.

12 A. That is a way, yes.

13 Q. Do you have an opinion as to whether or
14 not incinerating Askarel in a conventional manner,
15 less than 1,600 degrees Fahrenheit, is a method of
16 proper disposal?

17 A. I have an opinion, yes.

18 Q. What is that opinion?

19 A. I would not describe it as a method of
20 proper disposal.

21 Q. Has it ever been considered a method of
22 proper disposal?

23 A. Not to my knowledge.

24 Q. If an end user is properly disposing of
25 Askarel or liquids containing PCB's would he burn it?

1 Would he burn the liquid to dispose of it?

2 A. Will you define burn for me because it's
3 so close to incinerate?

4 Q. Other than using the Monsanto technique?

5 A. Just ordinary burning as most of us would
6 understand it?

7 Q. Yes.

8 A. No. I would suggest that that would not
9 be acceptable.

10 Q. Prior to the invention by Monsanto of an
11 incinerator suitable for burning liquids containing
12 PCB's what was the method of disposing of liquid PCB's
13 other than approved landfills?

14 A. I cannot speak because I don't know what
15 methods were used.

16 Q. I'm sorry, I'm not asking about methods
17 being used and forgive me because it was a poor
18 question.

19 Prior to 1900 and 71 when Monsanto put on
20 line its incinerator what would have been an
21 acceptable approved method of disposing of liquids
22 containing PCB's other than an approved landfill?

23 A. There was no other acceptable method of
24 disposal.

25 Q. When you were in charge of the

1 maintenance electricians and actually dealing with --
2 and I get the impression that this is about as close
3 as you came to hands on dealings with transformers
4 containing PCB's?

5 A. I guess, yes, that's an accurate
6 description.

7 Q. Did you consider it your responsibility
8 to see to it to the proper disposal of liquids
9 containing PCB's?

10 A. Yes.

11 Q. Do you have an opinion as to whether or
12 not it is the responsibility of the end user of the
13 liquids containing PCB's to see to their proper
14 disposal?

15 A. I do have.

16 Q. And what is that?

17 A. It's up to the end user who's in
18 possession of the liquid that is no longer usable to
19 arrange for proper disposal because he's the one with
20 the most information regarding what the material is,
21 what use was it in, what contaminants it might
22 contain. In other words he knows more about that
23 material than anyone else does so the responsibility
24 is his to send it to the right place.

25 Q. Where it will be properly disposed of.

1 A. Correct.

2 Q. Do you have an opinion as to whether or
3 not it is the responsibility of the end user to take
4 any steps to insure that the place he sends it is the
5 right place?

6 A. Certainly I do.

7 Q. What is that?

8 A. It's his responsibility to make sure that
9 the place he sends it to is appropriate for that
10 particular material.

11 Q. In your opinion were the end users of
12 liquids containing PCB's for use in transformers other
13 than that class of user we defined earlier as
14 consumer, the Holiday Inn manager type.

15 A. I see.

16 Q. Are you of the opinion that that class of
17 end user had enough information prior to 1970 to know
18 and appreciate the necessity for the proper disposal
19 of liquids containing PCB's?

20 A. It's my opinion they did.

21 Q. And was that information generated by
22 Monsanto and communicated through its customer base or
23 was it information available to them from other
24 sources as well?

25 A. A good bit of that information originated

1 with Monsanto. This does not preclude that Monsanto's
2 customers didn't have additional information and
3 relayed the total package of information on to their
4 customer regarding the product they sold them and
5 materials involved.

6 Q. Do you have any reason to believe that
7 customers of Monsanto that used your liquids or
8 liquids that you blended for them according to their
9 specifications in electrical transformers failed to
10 communicate to their customers sufficient information
11 concerning the need and the significance of proper
12 disposal?

13 A. First part of your question do I have
14 what?

15 Q. An opinion.

16 A. Yes, I do.

17 Q. And what is that opinion?

18 A. It's my opinion that Monsanto's customers
19 who manufactured these transformers with PCB fluids
20 did a more than adequate job conveying information to
21 the purchaser of that apparatus.

22 Q. Specifically with respect to the need for
23 adequate disposal. Was that kind of information in
24 your opinion communicated to the ultimate user by
25 Monsanto's customers?

1 A. In my opinion, yes.

2 Q. Just for informational purposes sir if I
3 may. These documents, and by these I'm referring to
4 Exhibits 5, 8, 4, 3 and 2, have all been identified as
5 being approved and distributed after 1970, '71.

6 A. Correct.

7 Q. Now the other documents that you have
8 before you, the first one being Exhibit 18, Askarel
9 Inspection and Maintenance Guide. What is the
10 approximate date of that publication?

11 A. (Reviewing Document). I cannot tell
12 looking at this document.

13 Q. We have other documents that have the
14 same title, for example 19 I believe is one and 15 is
15 one, 16 is one and I can't tell if these things with
16 the pixies on them belong in the same category. Do
17 you know?

18 A. I'm sorry?

19 Q. These with the pixies on the cover, do
20 they belong to the same category of documents as this?

21 A. They're roughly the same kinds of
22 documents, addressing Askarel fluids in transformers.

23 Exhibit 14, 18 and 19 appear to have the
24 same look about them but unless we can look at almost
25 every word they appear to be reprintings or maybe even

1 some slight alterations or changes from publication to
2 publication.

3 Q. I guess the question I'm leading up to
4 sir is is there any way for you to arrange these in
5 chronological order?

6 A. I'm just not familiar --

7 Q. Without reading each word.

8 A. I don't know that I can do that. I don't
9 know the cataloging system.

10 Q. That's all right. We'll get someone else
11 to do that.

12 Now the ones that are labeled Monsanto
13 Inspection and Maintenance Guide, what is the
14 distribution of these? Do they accompany an order?

15 A. If it's the first order generally the
16 salesman has been by and has left this document and
17 the order is placed --

18 Q. Each customer gets one of these?

19 A. For sure one copy. They're of course
20 available at any time with requests. In fact copies
21 of these were also sent to some of Monsanto's
22 customers in big bundles and they were overlaid with
23 the customer's, Monsanto's customer's name and then
24 forwarded it to their customers.

25 Q. Now these here, do they get the same

1 distribution?

2 A. Yes.

3 Q. And these here, that's 13 and 12.

4 A. Yes.

5 Q. How about these, which are 11 and --

6 A. 10 and 11. Yes. Same kind of situation.

7 Every effort was made --

8 Q. To give these to the customers?

9 A. Right.

10 Q. How about this one?

11 A. Number 7?

12 Q. Right.

13 A. That's a, this one happens to have a date
14 on it, that's 1960, this is probably one of the
15 earliest ones we have here, a pre cursor to some of
16 these others.

17 Q. Okay. Thank you, sir and with the
18 understanding that in the event I am successful in my
19 request for additional paper I get a chance to meet
20 with you I pass the witness.

21 (RECESS TAKEN BY PARTIES.)

22 MR. HESTER: I have decided not to ask
23 any questions of Mr. Pappageorge but I would like to
24 reserve the opportunity to ask him questions if we
25 have a follow up deposition.

1 I pass the witness.

2 MS. ANOUILH: I also pass the witness
3 with the reservation of asking questions if we resume
4 at a later date.

5 MR. MCCAUL: Very few questions.

6 EXAMINATION

7 QUESTIONS BY MR. MCCAUL:

8 Q. My name is Mike McCaul, I'm with the
9 Justice Department and I represent the United States
10 in this lawsuit. We've been brought in as a third
11 party defendant by your corporation, Monsanto
12 Corporation.

13 Are you aware of that lawsuit first of
14 all?

15 A. This is the first I heard of it.

16 Q. Okay. Are you aware of any of the
17 allegations?

18 A. Allegations?

19 Q. That's the first you heard of the lawsuit
20 I take it.

21 A. First I heard of it.

22 Q. In your subpoena duces tecum it asks you
23 to produce all documents related to the sale of fluids
24 containing PCB's by Monsanto. Do you have any
25 documents that would relate to the sale of PCB's to

1 the United States or any of its agencies?

2 A. I don't have any documents of any kind.

3 Q. None in your possession.

4 A. That's correct.

5 Q. And you have no knowledge which forms the
6 basis of the allegations made by Monsanto Corporation
7 against the United States?

8 A. Since I don't know what the allegations
9 are.

10 Q. Why don't I go ahead and refer to the
11 third party complaint and see if you have any
12 knowledge of this.

13 In the third party complaint Monsanto
14 alleges that the United States through the Defense
15 Logistics Agency delivered or caused to be delivered
16 batteries containing led and used electrical
17 transformers containing PCB oil to the metals
18 recycling site referred to by the plaintiff.

19 Do you have any knowledge which forms the
20 basis for those allegations?

21 A. I do not.

22 Q. And you would not have any documents
23 which would substantiate these allegations I take it?

24 A. That is correct.

25 Q. Are you aware of any communications which

1 were made between Monsanto and the United States as an
2 end user?

3 A. I'm aware that the United States through
4 its different departments and agencies was listed as a
5 customer of Monsanto's.

6 Q. Okay.

7 A. As a result they got the customer letters
8 that were mailed out at intervals.

9 Q. And let me specify the question even
10 more. In the Corpus Christi area are you aware of any
11 communications to the United States or any of its
12 agencies?

13 A. Not specific to the area, no.

14 Q. And again you said you do not have any
15 documents which would reflect sale of PCB materials to
16 the United States?

17 A. I don't have any, no.

18 Q. Does anyone from the Monsanto corporation
19 have those documents?

20 A. I do not know.

21 Q. Who would be the proper person to talk to
22 if any documents exist?

23 A. I would ask the Monsanto legal
24 department.

25 Q. Are you aware of any mandatory statutes

1 or regulations which would prohibit the United States
2 from selling transformers or electrical equipment?

3 A. No I'm not.

4 Q. Again your legal department would be the
5 best contact person?

6 A. That's where I would go.

7 Q. As far as any documents which would
8 reflect the sale of these type of materials to the
9 United States again the legal department would be the
10 best source?

11 A. If they're in existence I would go to the
12 legal department and ask.

13 MR. MCCAUL: That's all the questions I
14 have at this time.

15 MR. HALL: I don't have any questions for
16 you Mr. Pappageorge.

17 _____
18 WILLIAM PAPPAGEORGE

19
20 IN WITNESS WHEREOF, I have hereunto set my
21 and seal _____.

22 My commission expires _____.

23
24 _____
25 [NOTARY PUBLIC]

NOTARIAL CERTIFICATE

STATE OF MISSOURI)

)

CITY OF ST. LOUIS)

I, SUZANNE BENOIST, a Registered
Professional Reporter and a duly commissioned Notary
Public within and for the State of Missouri, do hereby
certify that WILLIAM PAPPAGEORGE, the witness whose
deposition is hereinbefore set forth, was duly sworn
by me and that this transcript of such deposition is a
true record of the testimony given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage, and that I am in no way interested in the
outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand and seal July 16, 1991.

My Commission expires October 7th, 1991.

NOTARY PUBLIC

KARPOWICZ REPORTING COMPANY
316 Merchants Laclede Building
408 Olive Street
St. Louis, MO 63102-2722
(314) 621-8883

July 16th, 1991

Woodard, Hall & Primm, P.C.
7000 Texas Commerce Tower
Houston, Texas 77002
ATTN: MR. ROBERT A. HALL

RE: HOLLAND VS. MONSANTO

Dear Mr. Hall,

This letter, incorporated as the last page of the deposition of WILLIAM PAPPAGEORGE taken on June 27, 1991 will serve as notice to you that the testimony is now ready for reading and signing of same.

I have enclosed the original transcript along with an errata sheet on which any necessary corrections should be made.

After the transcript has been reviewed and the signature page signed and notarized please return it to Mr. Terry so that the original transcript can be filed with court.

Sincerely yours,

SUZANNE BENOIST
REGISTERED PROFESSIONAL REPORTER

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ROGER DALE HOLLAND AND DRENDA)
SHEPARD HOLLAND, INDIVIDUALLY)
AND AS NEXT FRIENDS OF TAUSHA)
MARIE HOLLAND AND JESSICA)
NICOLE HOLLAND; WILLIE MAE)
HOLLAND AND J. SELMON HOLLAND)
Plaintiffs,)

vs.)

C. A. NO. C-91-78

MONSANTO, INC.; CENTRAL POWER)
AND LIGHT COMPANY; AND HOUSTON)
LIGHTING & POWER COMPANY,)
Defendants.)

DEPOSITION OF WILLIAM PAPPAGEORGE
Taken behalf of the Plaintiffs
June 27, 1991

EXHIBITS

Reported by
Suzanne Benoist, RPR, CSR

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(314) 621-8883
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Discovery Ex. No. 15
Cause No. C-91-78
Roger Holland v. Monsa
6-27-91 SB



Monsanto ASKAREP

Inspection and
Maintenance Guide

REVISED 3/87

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ASKAREL

Inspection and
Maintenance Guide

HOL 000208



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SECTION A TRANSFORMER ASKAREL

I. INTRODUCTION:

This manual describes the operating characteristics of transformer *askarel liquid* insulation and how it differs from mineral oil.

The information given is based on facts gathered by Monsanto over 30 years as producer of askarel, plus knowledge gained from the experience of transformer manufacturers and users. This guide is provided to outline the very simple maintenance required for askarel fluid in "modern" transformers and to offer suggestions for the sealing and maintaining of askarel in old units. By following this guide, users will obtain maximum service from askarel insulation with a reasonable minimum of maintenance. If questions arise relating to the designing and building of transformers — these should be referred to regular transformer suppliers.

Monsanto gratefully acknowledges the assistance, guidance, and the contributions of certain data by the following:

Frank M. Clark.....	General Electric
Edward L. Raab.....	General Electric
James G. Ford.....	Westinghouse Electric
George Shombert, Jr.....	Allis Chalmers

II. HISTORY OF TRADE NAME TYPES

"Askarel" is the generic name for non-combustible (fire-resistant) liquid insulation. In this respect, the insulation is completely different from ordinary transformer mineral oils. Transformer askarel is marketed by Monsanto. Whatever the trade-marked brand, the askarel contains Monsanto's Aroclor (chlorobiphenyl) . . . one of the best liquid insulations developed by science. This inert compound is chemically stable, fire-resistant, heat stable, non-corrosive, and has high dielectric strength under the operating conditions encountered in transformers.

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Askarel liquid insulation is made by thinning Aroclor 1260 with trichlorobenzene or tri-, tetrachlorobenzene mix. The first transformer askarel was made in 1932, in accordance with General Electric Company's patents, and was trademarked Pyranol 1488. Westinghouse, too, offered this askarel insulation in 1936 under their trademark Inerteen.

In the mid-1940's, as shown in the following table, tin tetraphenyl was added to General Electric's Pyranol to scavenge hydrogen chloride. Shortly thereafter, Westinghouse added phenoxy propene oxide to Inerteen for the same purpose. In 1963, General Electric replaced tin tetraphenyl with a diepoxide scavenger. This new formula, which replaces previous Pyranols, is called Transformer Pyranol A13B3B. Thus, today the two commercial types of formulations are General Electric's Transformer Pyranol A13B3B type and Westinghouse Inerteen PPO (7336-9) type.

The composition changes made in transformer askarel formulations are shown in Table I.

Table I THE COMPOSITION OF TRANSFORMER ASKARELS						
	Pyranol				Inerteen	Inerteen PPO (7336-9)
	1488	1467	1470	A13B3B		
Year Introduced.....	1932	1944	1952	1963	1936	1945
Ingredients:						
Aroclor 1260.....	60	60	45	45	60	60
Trichlorobenzene.....	40	40	40	40	40	40
Tetrachlorobenzene.....			15	15		
Tin tetraphenyl.....		0.125	0.125			
Phenoxy propene oxide.....						0.20
Diepoxide.....				0.125		

OTHER BRAND NAMES

Various electrical equipment manufacturers use other trade-marked names for askarel liquid insulation, such as Chlorextol (Allis-Chalmers); Noflamol (Wagner Electric); Saf-T-Kuhl (Kuhlman Electric). These askarel insulating liquids are one or the other of the two standard formulations. Still other manufacturers, who designate their insulation only by its generic name, askarel, assign it a number or code. By this number, Monsanto knows whether to furnish Pyranol A13B3B or Inerteen PPO (7336-9) type formulation to the user.

III. OFFICIAL TRANSFORMER ASKAREL SHIPPING SPECIFICATIONS

The official shipping specifications for the two modern transformer askarel formulations are shown in Table II.

Table II
OFFICIAL TRANSFORMER ASKAREL SHIPPING SPECIFICATIONS

Typical Properties	General Electric Co. Transformer		Westinghouse Transformer	
	Pyranol A13B3B		Inerteen PPO (7336-9)	
Color, APHA	150 max.		150 max.	
Condition	Clear		Clear	
Water content, ppm (ASTM D1533-60)	30 max.		30 max.	
Acidity, mg. KOH/g. (ASTM D974-55)	0.014 max.		0.014 max.	
Dielectric Strength, 25°C., 0.1 inch gap (ASTM D877-49)	35 KV, min.		35 KV, min.	
Dielectric Constant, 100°C., 1 KC (ASTM D924-49)	3.8 to 4.3		3.7 to 4.0	
Volume Resistivity, 100°C., 500 volts DC 0.1 inch gap, 10 ⁹ ohm-cm.	100		100	
Inorganic chlorides, ppm. (ASTM D1821 and G.E. Method E4C41B)	0.10 max.		0.10 max.	
Refractive index, 25°C. (ASTM D901-56)	1.6075 to 1.6085		1.6137 to 1.6147	
Viscosity at 37.8°C. (ASTM D88-56) Saybolt Universal Seconds	41 to 45		54 ± 2	
Pour point °C. (ASTM D-97-57)	-44 or lower		-32 or lower	
Specific gravity 15.5/15.5°C. (ASTM D287)	1.560 to 1.571		1.560 to 1.568	
Burn point (ASTM D92)	None to boiling		None to boiling	
Distillation range (ASTM D20-56) corrected for stem and barometric pressure	1st drop	210°C. min.	1st drop	200°C. min.
	35%	240 to 256	40%	below 270°C.
	55%	290 to 330	90%	395 to 415°C.
	65%	385 to 400		
	95%	395 to 415		
	60.5 ± 5%			59.1% min.
Fixed chlorine	After heating with aluminum for 6 hrs. at 200 to 220°C., the aluminum must not be corroded on either visual or weight inspection and the askarel should meet the following specifications:		200 max.	
Corrosion test	200 max.		0.014 max.	
	0.014 max.		2.0 max.	
	2.0 (tent.)		Clear	
Color, APHA	0.115 to 0.135%		0.18 to 0.22%	
Acidity, mg. KOH/g.	Diepoxide		phenoxy propene oxide	
Inorganic chlorides ppm.	Less than 1.0% of total combustible gases including carbon monoxide, hydrogen and volatile hydrocarbons.		0.0007	
Condition	0.0007			
Scavenger content				
Arc formed gases				
Coefficient of Thermal Expansion (ASTM D1903), CC./CC. /°C.				

The above two formulas are used in modern transformers. There are a number of units in service dating back to 1933 with askarels of somewhat different compositions. These will be compatible with the above modern formulations.

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IV. INTERCHANGEABILITY AND STABILITY

A. Interchangeability:

The two general types of askarel insulation shown in Table II can be either mixed or interchanged and there will be no difference in the operation of the transformer. However, askarel insulation *must never be mixed* with mineral oil.

Over 2% mineral oil in askarel begins to lower its fire resistance. Further, materials of construction in the transformer that are compatible with askarel may not be compatible with oil and vice-versa. For example: a significant amount of askarel in a transformer built for mineral oil will attack gaskets, adhesives, core bindings, impregnating varnishes, etc.

B. Stability:

Askarel liquid insulation is highly pure, fire-proof liquid made under close chemical control. It does not vary in composition like the commercial range of mineral oils.

Askarel does not deteriorate when exposed to air, heat, hot metal; it does not break down over long use to form conducting or corrosive chemicals; it does not oxidize or sludge. Askarel will remain perfectly stable year after year unless broken down by exposure to severe arcing.

The only real "enemy" of askarel is *contamination by water*. Keeping askarel water-free will insure long-time service.

Askarel is heavier than water. If water gets into askarel insulation, only a tiny amount (125 ppm) dissolves — the rest floats on top.

V. DIRECTIONS FOR HANDLING

A. Keep Dry:

In handling, storing, sampling, inspecting askarel — and in operating askarel transformers — take every precaution to guard the askarel insulation from exposure to high humidity and moisture contamination. Keep 5, 30, or 55 gallon drums of askarel dry; lay stored drums on their sides with the bung at the highest point from floor to keep water off the drum head (which can be sucked into the askarel by the drum "breathing"). This precaution is not necessary when drums are stored indoors, which is the preferred way of storing.

B. Use Ordinary Personal Precautions:

Transformer askarel has been made, handled, and used for over 30 years without causing toxic or other ill effects. It can be handled with only minor precautions. If accidentally spilled on hands, no serious skin irritation will occur. However, liquid askarel has a solvent action (similar to paint thinner) on the fats and oils of the skin and prolonged contact may lead to drying and chapping of the skin.

In case of contact, wash off the skin with soap and water; remove and dry clean saturated clothing. Clean up spills with rags, sawdust or absorbent clay. Eye contact may result in painful irritation but no permanent damage to tissues. If askarel gets in the eyes, flush with large amounts of water. As with all eye first-aid, refer to a physician. To relieve irritation, physicians have used a 1% Pontocaine as well as ophthalmic cortisone acetate solution, or castor oil.

Infrequent exposure to askarel vapors will not cause ill effects. However, prolonged exposure to high vapor concentrations should be avoided. If hot askarel must be handled in a closed or confined area, provide the area with ordinary exhaust ventilation — or — wear an organic cartridge respirator approved by the U. S. Bureau of Mines.

VI. EXPECTED SERVICE LIFE

Properly designed and installed askarel transformers will give trouble-free service for a minimum of 30 years. Since their introduction in 1932, the manufacturers report finding the over-all failure rate to be less than 0.5% for all units under test and service conditions. The Edison Electric Institute's report (1956-1958) on their member utilities publishes the failure rate for askarel transformers as 0.13 per hundred banks per year. Even the rare reports of failure are invariably found to be due to improper sealing that allows moisture to enter.

VII. DIELECTRIC STRENGTH — MOISTURE RELATIONSHIP

The dielectric strength of askarel is highly sensitive to excess moisture; not sensitive to ordinary dissolved contaminants. While the dielectric strength can also be lowered by severe arcing, askarel turns noticeably black or has particles of sooty carbon floating in it if arcing has occurred. Then the transformer should be repaired and the askarel replaced.

New askarel has a minimum dielectric strength of 35 KV at 25°; a maximum moisture content of 30 ppm. If the dielectric strength is checked periodically and decreases significantly — this indicates moisture pick-up, arcing, or both. When the dielectric strength has dropped to 26 KV or less, an analysis for water is necessary. If water is found in excess of 100 ppm at 25° C., its source should be located and corrections made.

When the moisture content approaches 125 ppm (saturation level), the dielectric strength of askarel drops below the value required for efficient insulating. The moisture content should not be allowed to rise over 70 ppm; it should be held as near as possible to 30 ppm. Maintaining a low moisture level will assure high dielectric strength and top operating efficiency.

Table III shows the relationship of dielectric strength vs. moisture and Table IV indicates the approximate water solubility limits in askarel and mineral oil.

Table III
RELATION OF "BREAKDOWN STRENGTH" TO AMOUNT
OF DISSOLVED WATER IN ASKAREL AND MINERAL OIL

Water Content (PPM)	Breakdown Voltage (ASTM)	
	Askarel	Mineral Oil
0	70 KV	50 KV
20	55	39
40	47	30
60	40	26
80	38	22
110	10	5

Table IV
APPROXIMATE SOLUBILITY OF WATER IN TRANSFORMER
ASKAREL AND MINERAL OIL

°C.	Temperature °F.	Amount of Water (PPM) Dissolved	
		Askarel	Mineral Oil
-30	-22	8	8
-20	-4	16	10
-10	14	28	13
0	32	41	20
10	50	65	33
20	68	94	58
30	86	128	85
40	104	170	130

TURBIDITY

... may be the visual sign of undissolved water, or may indicate contamination from core materials, dirt, or deteriorating construction materials. Cloudiness may also result from cold precipitation of tin tetraphenyl "scavenger" that was used in the earlier Pyranols. This scavenger begins to come out of solution around 15°F. above zero. To redissolve it requires heating to 150 - 200°F. and agitation.

High dielectric strength will quickly indicate that any turbidity present is not moisture; that the insulating efficiency of the askarel is still excellent. However, if the dielectric strength is below 26 KV, moisture should be determined, using the Karl Fischer method (ASTM D1533-60).

The dielectric strength test for askarel serves primarily as an indicator for moisture. It is by far the most important maintenance test for transformer askarel.

VIII. TYPICAL VALUES FOUND IN ASKAREL FLUID UNDER VARIOUS USE CONDITIONS

Table V gives the entire spectrum of properties that are typical for freshly-made transformer askarel as it goes through the various normal and abnormal conditions of use.

The data in Table V are in terms of *only* the askarel *fluid* and do not refer to insulation resistance or power factor measurements on the over-all transformer insulation.

Several utilities studying the power factor values of the over-all transformer insulation system indicate that the unit power factor of a new askarel transformer should range from 1% to not over 5%. This would generally correspond with the askarel *fluid* properties as given under heading "B".

Table V
TYPICAL VALUES FOUND IN ASKAREL FLUID UNDER VARIOUS CONDITIONS OF USE

	A	B	C	D	E	F
	New askarel	Askarel in prop- erly* built new or rebuilt units prior to use.	After normal oper- ation; a survey of 50 units, most 2-5 yrs. old; some 10.	Non-arc'd but slightly contami- nated askarel in improperly* built units, new or slightly used.	Same askarel as in Column D — after refining.	Heavily arc'd askarel due to neglect and internal electrical malfunction.
Inspection Check Points						
Color	Light straw	Light straw	Light straw	Can have foreign shades, blue, green, red cast.	Foreign shades remain showing extraction of oil soluble color.	Black
Clarity	Clear, free from particles	Clear, practically free from particles	Clear, trace of particles	Clear, slight amount of particles	Clear, free from particles	Contains carbon particles
Moisture 25°C.	30 ppm	30 ppm	10-70 ppm all dissolved water	20-100 ppm all dissolved water	30 ppm	Near 125ppm saturation level — plus possible undissolved water
Dielectric Strength 25°C., 0.1" gap	35 KV minimum	35-48 KV	35-45 KV	30-42 KV	40-45 KV	5-15 KV
Volume Resistivity 100°C., 500 Volts, DC., 0.1" gap	100 x 10 ⁹ ohm-cm. minimum usually 500-1,500	40 x 10 ⁹ ohm-cm. minimum usually at least 100 x 10 ⁹	15-400 x 10 ⁹ ohm-cm.	about 5 x 10 ⁹ ohm-cm.	at least 1,500 x 10 ⁹ ohm-cm.	about 3 x 10 ⁹ ohm-cm.
Power Factor: 100°C. 60 cycles 25°C. 60 cycles	2-5% 0.05-0.1%	10-25% 0.5-2%	10 to near 80% 0.5 to near 10%	30 to 100% about 7 to over 15%	2-5% 0.1-0.2%	100% at least 25%

* A properly built transformer is defined as one in which the materials of construction are chemically and electrically compatible with askarel.

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Starting ideally with situation "B", it is normal to expect the power factor of the fluid in a satisfactorily operating askarel transformer to increase as shown under heading "C". The "over-all" power factor of the transformer in normal service is expected to rise, but preferably not much beyond 5%. In this normal situation, the moisture level of the askarel fluid and its dielectric strength will be satisfactory, as shown in heading "C".

Occasionally the power factor of a non-arc'd, satisfactorily-operating askarel transformer is found to be relatively high, i.e., 15%. In this case, the power factor of the askarel fluid will also be high, perhaps as high as 50% at 20°C. and 60 cycles.

It is not good practice merely to note that high power factor of the askarel fluid is to be expected. The important step is to check dielectric strength and note whether there has been a downward trend. A downward trend in dielectric strength very likely indicates moisture entrance and should be confirmed by a Karl Fischer test for water.

The importance of any abnormalities in dielectric strength and moisture content of the askarel fluid cannot be overemphasized! Where abnormal values for the dielectric strength or moisture content occur, the power factor of the transformer can be expected to be abnormally high; the expected high power factor of the askarel fluid will induce this.

The indication that a high power factor on the transformer and on the fluid is due to contamination can be verified by earth refining the askarel fluid and noting whether after refining the test results correspond with heading "E".

Assuming no mechanical defect or arcing, if the power factor of a new askarel transformer is relatively high, the power factor of the fluid will also be high, giving the situation under heading "D". This reflects contamination that should have been removed by the manufacturer of the transformer.

In absence of mechanical defect, where there are no abnormal losses in dielectric strength, and no moisture pick-up in non-arc'd askarel — the use history shows that a relatively high power factor for the askarel fluid (as compared with mineral oil) is to be expected. Normally, high power factor is due to contamination and not deterioration of the askarel operation.

As shown by F. M. Clark in his book, "Insulating Materials For Design and Engineering Practice," John Wiley & Sons, N. Y., 1962 — activated alumina can be used in the circulating system to bring the power factor down and keep it as low as possible.

IX. CHECK POINTS FOR MAINTAINING ASKAREL INSULATION

A. General Considerations:

Modern askarel transformers with welded construction or silicone gaskets for hand hole-cover, switch and terminal compartment covers, with properly constructed bushings require little or no maintenance. With properly constructed transformers, annual or semi-annual visual inspection and dielectric strength test of the askarel fluid should suffice for routine maintenance checking over many years of service.

However, many askarel units were installed in the early 1930's — before the development of some of the better modern gasketing materials and before improved designs were developed for sealing out moisture. Such early units should be, and can be, modernized. Leaky or deteriorated gaskets should be replaced. If the askarel has become contaminated, it should be reconditioned. At the same time, a general clean-up of the unit and possible refinishing may be desirable.

If it is not convenient to take an old transformer out of service for general repairs, leaky gaskets can be sealed temporarily by painting over the leaky area with epoxy cement.

A survey of users indicates a good number of early-built askarel transformers (over 20 years old) are kept in continuous service in critical installations by the following steps (instead of modernization).

The operating units are equipped with compound pressure gauges for reading pressure above and below atmospheric. Positive pressure is maintained on the shell by introducing nitrogen at 2 to 3 pounds above atmospheric. Regular workmen in the area daily record the temperature and pressure. If a sudden pressure drop is noted more nitrogen is introduced and the gaskets are checked for leaks with soap solution. Leaks are sealed by applying epoxy cement.

B. Modern Sealing Procedures:

Transformer purchasers should specify the following modern techniques for sealing:

1. **Welding Construction:** Covers, radiator connections, switch and terminal housings, instrument connections, etc. should be welded.
2. **Bushing Connections:** The most satisfactory bushings are the type with rolled-on flanges and two ring seals rolled into a depression in the porcelain — sealed with silicone rubber rings held under compression. Metal-to-glass or metal-to-porcelain sealed bushings are also satisfactory.

If for any reason the above type bushings cannot be used then use a porcelain or glass bushing with a silicone or Viton gasket retained in a groove. The gasket can be either rectangular or circular cross section, usually $\frac{1}{4}$ inch thick.

3. **Small Size Connections:** When not possible to weld, small size connection seals should be made with Flexitallic stainless steel rings. The surfaces must be machined and parallel. The filler between the steel laminations of the Flexitallic ring should be either silicone or Viton.

4. **Gaskets For Hand-Hole Covers:** Modern design specifies silicone gaskets. Such gaskets must be retained in a groove. The groove preferably is machined into the flange or cover. However, it can also be formed by welding concentric steel strips to the flange or the cover.

Generally the gaskets should be $\frac{5}{16}$ to $\frac{1}{2}$ inch thick for covers, depending on the depth of the groove. A rectangular section is usually used.

The silicone material should be Dow-Corning No. 50 Silastic or equivalent. This is a low compression set material. For best sealing 20 to 25% compression is recommended, with ample clearance in the groove to allow for this compression.

No cement is required. With reasonable care the gasket is removable without damage and is reusable.

Silastic 50 is slightly swelled by askarel which contributes to the tightness of the seal. It is not deteriorated by askarel fluid or vapors. It resists weathering and it is thermally stable and flexible at all operating temperatures. It is an excellent moisture barrier.

Notes: a. Dow-Corning, Midland, Michigan will supply a list of Silastic 50 gasket fabricators to all transformer manufacturers or users. They will also furnish technical data.

b. Any user of Pyranol transformers, made by General Electric Company at Rome, Ga., will receive prompt and generous help for converting to the modern silicone or Viton gaskets by contacting the General Electric Company's Service Engineering Department at Rome, Ga.

See Appendix K: Seals, Properties and Procurements.

C. The Older Sealing Arrangements:

The older type gaskets consist of either cork or cork-nitrile rubber combinations or straight nitrile rubber.

1. **Cork-Nitrile Combinations:** Covers for the main tank, hand-holes, switch and terminal chambers, relief diaphragms etc. are held in place by studs welded to the flange or by bolts. The gaskets are cut with openings and placed over the bolts. Often Shellac (Westinghouse Style No. 1150419, or General Electric Company's Glyptal 1276) is used to cement the cork to the flanges.

The following is recommended for sealing with the cork — nitrile rubber combination:

Use Armstrong NC-757 cork-nitrile material or equivalent. The gasket can be cut from a single sheet or by scarfing strips of the material. A convenient method for joining strips is to make a Keystone Type joint. For this, Westinghouse, Sharon, Pa., offers their gasket cutter Style No. 328 B614 G01, (about \$15).

The joints should be cemented and the gasket also cemented to the flange, using one of the above cements. Excess cement should not be allowed to reach the interior of the transformer.

After installation and bolting, the outside edge of the gasket should be coated thoroughly with epoxy cement to increase weather resistance.

This epoxy cement is a paste to which a curing catalyst is added immediately before use. Typical are:

- a. Epoxy Patch Kit #1-C
Hysol Corporation, Olean, N. Y.
 - b. Scotchcast Resin #4
Minnesota Mining and Manufacturing Co.
St. Paul, Minnesota
 - c. Adhesive A-1 and Activator Type B
Armstrong Products Company
Argonne Rd., Warsaw, Ind.
 - d. Adhesive 9860-1, Synthetics Organic Company, Cleveland, Ohio, used with activator diethylene triamine (Carbide and Carbon Chem. Co.)
2. **Straight Nitrile Rubber:** When straight nitrile rubber was originally used, invariably the gasket was recessed in a groove. This was to prevent gasket flow and to protect the material against excessive compression. Although this type seal was not cemented, the nitrile rubber gasket is not reuseable.
- Since grooves or stops have already been provided for the nitrile rubber seal, Silastic 50 can be easily substituted and is recommended. This conforms with modern practice.

X. PERIODIC FLUID INSPECTION AND WHAT CHECKPOINTS MEAN

On a regular schedule — at six, nine, or twelve month intervals — make a simple visual inspection of your askarel insulation and run a dielectric strength check.

A. Visual Inspection:

Askarel is a clear, faint-yellow liquid. After long-term use this color may gradually intensify to light brown. The fluid should remain clear and free from turbidity or cloudiness.

Any color change — such as to a green, red or blue cast — indicates extraction of impurities from the solid insulation. If a distinct foreign color pick-up is noted, check the complete range of electrical characteristics and notify the transformer maker. The electrical characteristics may be found to be unimpaired. Color change alone (except for black) is not a danger signal since the contamination is not likely to impair the dielectric strength.

B. Dielectric Strength:

If the dielectric strength has decreased significantly from the last inspection, or if it has gradually decreased below 26 KV range (at 25°C.) — RUN A CHECK FOR MOISTURE. Use ASTM D901, D877 (Karl Fischer Method).

The dielectric strength of askarel is the major indicator to the operating efficiency of your liquid insulation and of the askarel transformer itself. Besides the "visual" inspection tests, dielectric strength is the only test necessary to run on a routine basis. Well-sealed askarel transformers have service records of 25 to 30 years on the original askarel. New askarel has a minimum dielectric strength of 35 KV at 35°C., a maximum moisture content of 30 ppm.

XI. INSPECTION CHECK LIST

1. If askarel is clear, even though darkened to light brown; has no sediment or turbidity; has dielectric strength over 26 KV . . . give it the inspection "OK".
2. If askarel is clear; has foreign color of blue, green, red . . . it is "extracting color" from internal materials. This is not, of itself, an operating hazard when the dielectric strength stays over 26 KV and moisture remains low. However, this rare occurrence calls for checking into condition of the interior construction and consulting the transformer maker.
3. If askarel is clear; but dielectric strength drops to 22 or lower KV, and moisture rises over 80 ppm . . . the askarel is ready for simple "refining". If the moisture is near the saturation level (about 125 ppm), a thorough inspection should be made for water droplets in the transformer tank, and even for "globules" or water floating on the askarel surface. If found, the transformer manufacturer should be consulted for reconditioning both the transformer and the fluid.
4. If askarel is dark brown to black; if black particles of carbon are seen; and dielectric strength is low . . . the askarel has been broken down by arcing. It cannot be refined and should be discarded.

If any of these four simple inspection tests appear out of the ordinary, or the relationship between appearance and test values is abnormal — contact your transformer supplier for a complete analysis.

Whenever a sample is to be shipped to Monsanto, please follow the directions shown under: "SAMPLING ASKAREL".

XII. CONTAMINATION IN TRANSFORMERS

Unlike mineral oil which can oxidize, sludge and deteriorate — askarel breaks down in transformer use *only when strongly arced*.

Thus, while askarel does not decompose in normal use — it can be contaminated more readily than the relatively non-polar mineral oil.

For example the following Table VI shows how a small amount of synthetic rubber or a bit of varnished cloth markedly increases the power factor of the askarel. Please note, however, that *such minor contamination has no adverse effect on the dielectric strength*. As explained, moisture entrance through faulty seals seems the only contaminant in normal use that lowers the dielectric strength of transformer askarel.

Table VI
EFFECT OF COMMON INSULATION MATERIALS ON POWER
FACTOR AND DIELECTRIC STRENGTH
(HEAT AGED 96 HOURS IN ASKAREL AT 100°C.)

<u>Material Immersed</u>	<u>Askarel After Exposure</u>	
	<u>Power Factor,</u> <u>Percent at 60</u> <u>cyc., 100°C.</u>	<u>Dielectric</u> <u>Strength</u> <u>25°C.</u> <u>35 KV</u>
None (control).....	1.0	42
Black varnished cloth.....	85.0	40
Copper.....	1.5	37
Pressboard.....	2.0	39
Manila paper.....	1.5	41
Phenol formaldehyde resins.....	1.6	36
Shellac.....	6.0	39
Iron.....	5.0	39
Synthetic rubber.....	70.0	39

Similarly, trace contaminants from commonly used construction materials can lower the volume - resistivity of askarel, without affecting its dielectric strength. Table VII shows this.

Table VII
EFFECT OF COMMON INSULATION MATERIALS ON VOLUME
RESISTIVITY OF ASKAREL

<u>Sample</u>	<u>Volume Resistivity x 10⁹ ohm-cm</u> <u>(at 100°C., 500 Volts DC., 0.1" gap)</u>
1. New askarel before heat aging.....	2,000
2. New askarel after heat aging 96 hours at 100°C.....	1,900
3. After heat aging with 1 sq. inch specimens of:	
a. Phenolic resin tap changer material.....	1,200
b. Paper.....	750
c. Grade A press board (tan).....	500
d. Grade A press board (gray).....	500
e. Grade A press board, laminated strip.....	400
f. Cotton wrapping.....	300
g. Glyptal 1276 cement, cured 48 hrs. at 110°C.....	100

While trace contamination easily lowers volume resistivity from high levels, it is important as previously noted in Table V Case F, that heavy contamination (as when arced) does not lower the resistivity below the order of 10⁹ ohm-cm. at 100°C.

The different behavior of askarel vs. mineral oil in these respects can be summarized as follows:

High power factor and low volume resistivity in transformer mineral oils are commonly regarded as "danger signals" that the oil has deteriorated and broken down chemically.

This is NOT TRUE of askarel liquid insulation, unless the dielectric strength is low.

XIII. REFINING ASKAREL FOR RE-USE

A. Filtering Through Dry Blotter Paper to Remove Moisture and Extraneous Particles:

Most operators prefer portable refining apparatus, such as a plate press fitted with a dolly, (available from Sparkler, Mundelein, Ill., Westinghouse Maintenance and Repair Dept., Chicago, or General Electric Co., Pittsfield, Mass.); or the earthen cartridge filter type, (available from Industrial Filter Corp., Lebanon, Ind.). Filter paper liners for the plate press are available from Carl Schleicher and Schuell Company, Keane, New Hampshire and manufacturers of filter presses listed above.

The filter paper must be dried immediately before use. For best results, spread the paper for maximum surface exposure in a hot air circulating oven and heat it for 4 to 6 hours at 110°C.

If possible do not take the transformer out of service until ready to filter the fluid. This will keep the transformer coils relatively hot and dry. Processing the fluid should start immediately after de-energizing the unit.

Circulate the askarel hot (but not over 55-60°C.) through the filter fitted with the dry paper liners.

After filtration the dielectric strength of the askarel should be 35 KV minimum.

1. **Precautions:** Filtering should not be done when the relative humidity exceeds 75%.
2. Any flexible hoses and gaskets on the refining equipment should be lined with or made of materials that will not be softened by contact with askarel fluid. (Silicone or Teflon-lined, or flexible metal materials are suitable.)

Table VIII	
GUIDE TO RATE OF DISSOLVED WATER REMOVAL BY FILTERING ASKAREL THROUGH A PAPER PRESS	
Passes Through Paper Press	Water in Askarel PPM
0	115
1	35
2	22
3	18
4	12
5	10
6	10

B. Earth Treatment for Maximum Improvement of Power Factor and Volume-Resistivity:

1. Procedure:

(The askarel liquid should be relatively dry prior to the following earth filtration.)

Use finely divided Attapulpus clay or Fuller's earth (dried and activated by heating for 12 hours at 300-350°F. immediately prior to use) as a coating on the filter paper surface. The amount of earth used should be 0.1 to 0.2 per cent by weight on the weight of the askarel to be treated. (Askarel weighs about 13 pounds per gallon).

To deposit the earth evenly, stir one-third of the earth with a small portion of askarel in a clean container. Pump the mixture through the filter and follow with two more one-third portions. Then circulate askarel taken from near the top of the transformer, pass it hot (not over 55-60°C.) through the earth coated filter and feed back through the bottom transformer outlet. Continue circulation until the fluid is clear and test shows that the electrical properties are fully restored.

2. Effect of Earth on Removal of Scavengers:

Only slight and insignificant loss (by selective absorption) of tetratraphenyl and epoxides occurs when askarel is refined by treatment with 0.1 to 0.2 per cent by weight of earth. To remove significant amounts of the scavengers requires repetitious treatment with much larger amounts of earth.

3. Table IX — Approximate Relationship Between Power Factor, Volume-Resistivity and Dielectric Strength of Transformer Askarel:

Power Factor (60 cyc.)		Volume Resistivity x 10 ⁹ ohm-cm. (at 100°C., 500 Volts DC., 0.1" gap)	Dielectric Strength 25°C., 0.1" gap
100°C.	25°C.		
2%	0.05%	1500	35 KV
5%	0.1%	500	35
15%	0.7%	100	35
20-25%	2.0%	60-70	35
40-50%	—	25	35

If it is desired (although these factors are not generally considered important for askarel transformers), to keep the power factor as low as possible and the resistivity as high as possible, hang a container of anhydrous alumina or activated clay in the circulating system of the transformer.

XIV. CLEANING ARCED TRANSFORMERS

If a unit has arced so that the askarel is no longer fit for use, a thorough cleaning of the unit is necessary before refilling with new askarel insulation and returning it to service*. Follow this procedure:

- A. Drain out all dark, carbon-contaminated askarel. (Discard by dumping or burying where it will not contaminate a water supply.)
 - B. Carefully brush carbon deposits from internal parts and insulation, using a soft bristle brush making sure that insulation is not damaged.
 - C. Flush thoroughly using new askarel (*not* an oil, *not* a cleaning solvent).
 - D. Flush a second time with fresh askarel; drain; then fill to the proper level with new askarel.
 - E. Energize transformer to warm the fluid for 24 to 48 hours; then circulate the askarel through a filter, returning it to the unit filtered and ready for use.
- * This assumes that the cause of arcing has been established and corrections made. When severe arcing occurs, major repairs are usually necessary and the unit rebuilt. This procedure can be applied for flushing out repaired units.

XV. SAMPLING ASKAREL

Take a sample as close to the top of the liquid surface as possible. (Many large askarel transformers have a built-in sampling tube near the surface for convenient sampling). Then, to make sure that your SAMPLE truly represents your askarel insulation, take another sample from the bottom. If additional sampling tube connections are contrived on the valves for easier sampling, make the tubes of clean glass, stainless steel, aluminum or tin for rigid types; and silicone or Teflon tubing for flexible types.

Use NEW containers for the askarel sample. A new and thoroughly pre-dried small-mouth quart glass bottle fitted with a Bakelite screw cap fitted with an aluminum or tin bottle cap liner is recommended for "quick on-the-site testing." (If complete analysis is to be made, a 5-pint size sample is required).

Be sure that the new bottle does not stand open to collect dust or moisture. Rinse the sample bottle and cap lining two or three times with askarel from the transformer; then fill it. If the sample will be tested promptly, a clear glass bottle can be used. If sample is to be stored indefinitely, use an amber glass bottle or wrap clear glass with aluminum foil.

- A. Select a dry day. Do not sample insulation on a warm, moist day when humidity exceeds 75%, and . . .
- B. Make sure that the askarel is at least as warm as the surrounding air. (Cold liquids can condense moisture from humid air.)
- C. When sampling askarel from transformers, it is best to take the sample when the unit is warm and operating at average or maximum load. Especially as a check on moisture (as reflected by a dielectric strength test), sampling the warm askarel more truly represents its condition during operation.

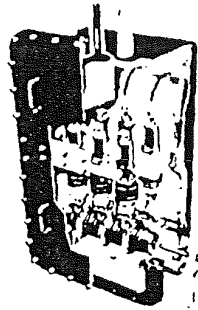
Experience shows that water will migrate from a transformer's solid insulation to the askarel liquid and vice versa, depending on temperature. Therefore, when the transformer is hot, the moisture is most likely to be found in the liquid. This accounts largely for periodic variations in dielectric strength. For example: a relatively high dielectric strength may be found during winter months and a relatively low dielectric strength during the summer months on samples taken from the same unit.

SECTION B

ASKAREL FILLED SWITCHES AND TERMINAL CHAMBERS

I. INTRODUCTION:

High voltage leads are usually connected to askarel or mineral oil-filled network transformers and power centers through terminal chambers and switches. In some cases terminal chambers are not used, and the high voltage leads are connected directly to the switch terminals. They may be filled with either askarel or mineral oil. Switches are usually rotary or drum type fitted with a revolving block and porcelain unit as the principal element arranged for three-phase service. (A cutaway view of a typical terminal chamber-switch combination is shown for reference.)



Askarel transformers with attached switches have been in use for about 30 years. When they were first introduced, the availability of insulating and gasketing materials was rather limited and even the best materials at the time had no service history. As a result, inadequate gasketing materials such as cork, nitrile rubber, and nitrile rubber-and-cork particles were used. While satisfactory for a limited period of time, these materials cannot be depended on for the expected long life of the equipment.

The terminal chamber is usually above or below the switch compartment and separated by a steel wall through which the bushings are inserted. When bushings are properly selected and correctly installed, there is no leakage from one compartment to the other. With poor bushing seals, and the terminal chamber above the switch, potting compounds or cable oil can seep into the askarel. When the terminal chamber is below the switch, askarel can drain into the terminal chamber.

II. SOURCES OF CONTAMINATION

There are three possible sources of contamination for askarel in switches and terminal chambers; they rank in this order of frequency: (1) water entering through poor gaskets; (2) decomposition products from arcing when switch is used to break magnetizing current; (3) entrance of pothead or cable compounds through leaky bushing seals.

Unlike an askarel transformer where the amount of contaminant is likely to be very small (probably only trace amounts) in relation to the volume of askarel fluid — in switches or terminal chambers with faulty seals, the amount of contamination can be relatively large.

Experience has shown that, based on the number of installed askarel-switch units, the percentage of failures is extremely small. When investigated, it has been found that most failures originate in the switch chamber. Water is the chief source of contamination. However, heavy contamination of askarel with petrolatum and asphalt material, due to leakage, have caused a few failures.

Petrolatum is used frequently for filling terminal chambers. When either cable oil or petrolatum seeps into askarel, no great harm results. The fire resistance will be somewhat decreased and power factor of the askarel will increase with an accompanying drop in resistivity. While highly undesirable, it is doubtful that failure of the unit results. Where asphaltic compounds are used in place of petrolatum, the danger is increased somewhat because asphaltic contamination may cause excessively high dielectric losses in the askarel.

When the terminal chamber is below the switch chamber, the potting compound can be contaminated by askarel if the bushing seals are leaky. This is undesirable because the askarel will increase the power factor and conductivity of the potting compound or cable oil and develop heat from dielectric loss. If this mixture is drawn into the cable insulation, a cable failure is likely. This again emphasizes the importance of tight bushing assemblies.

III. SEALING SWITCHES AND TERMINAL CHAMBERS

Proper bushing construction, use of Silastic seals and welding wherever possible is highly desirable (as covered in Section A). Where an elastomeric seal is to be used in contact with both askarel and petroleum oil, DuPont's Viton is suggested.

For new equipment the user should specify these modern sealing arrangements to keep out contaminants and minimize maintenance.

IV. MAINTENANCE FOR ASKAREL FILLED SWITCHES

- A. Switches used for grounding after power source has been de-energized will not undergo arcing.
- B. Switches interrupting magnetizing current will be subject to arcing; the amount of decomposition will depend on power interrupted, time and frequency of operation. As a general rule, the liquid should be checked after 5 to 10 operations.

1. On newly installed switches, check the askarel at 3, 6 and 12 month intervals; if found satisfactory, check once annually thereafter. With proper attention to the gasketing of covers and bushings, experience will probably indicate that less frequent inspection is warranted.
2. Check askarel for:
 - a. Dielectric strength (ASTM D877): It should be 26 KV minimum. If dielectric strength is low, confirm presence of water by Karl Fischer method ASTM D-1533. Filter to remove moisture. Dielectric strength should then be 30 KV minimum.
 - b. Presence of carbon from arcing: Fluid should be relatively free of carbon. If badly arced and very black, replace fluid. If only minute amounts of carbon are present, filtration is recommended. Check power factor of liquid (should not be over 5% at 25°C. and 60 cycles). Flush out switch chamber with several gallons of fresh askarel before refilling.
3. If there is discoloration, high power factor, detectable change in specific gravity or refractive index, or if fluid flashes below 250°F., there is a possibility of seepage of potting compound into the switch compartment. In this case, correct any leaky bushing seals with proper replacements and fill with new askarel.
4. If terminal chamber is below switch, check potting compound for presence of askarel (can usually be detected by odor or by an increase in specific gravity). If askarel is present, correct any leaky bushing seals with proper replacements, and renew compounds.
5. Examine cover gaskets visually. Deterioration can be detected by swelling and cracking of the exposed edge. In cases of severe deterioration, liquid seepage is usually present.
6. Check for leakage at packing gland of switching shaft. If leaking, repack with a Silastic ring type gasket.

SECTION C
ANALYTICAL SERVICES ON TRANSFORMER ASKAREL AVAILABLE
FROM MONSANTO

Transformer users not wishing to make their own fluid analyses can obtain the service from Monsanto. Simply contact Monsanto and specify what analyses are wanted. You will be sent the proper-sized sample container filled with fresh askarel. When you receive this, empty it and carefully take your sample (following the procedure for sampling in this guide). Send the container to Monsanto's laboratory. Charges listed include sample container, shipping, handling and laboratory costs.

Types of Analyses Available

Analysis 1)

ROUTINE MAINTENANCE CHECK

Total Charge: \$20.00

To determine the general condition of the fluid and find whether further analysis is necessary. (one-quart sample required)

Properties Tested
Color and Condition
Dielectric Strength
Moisture

You will be notified of the results of this test. If further testing is indicated, and you want a complete analysis, you will be sent a five-pint sample container. This sample will be used for the following series of tests:

Analysis 2)

COMPLETE ANALYSIS

Total Charge: \$50.00

(a) To determine the extent of fluid contamination, (b) earth refinement to determine what degree of restoration of electrical and insulating properties is possible, (c) check test to see how the fluid responded to earth treatment.

a) Complete Analysis: to determine the extent of contamination

Properties Tested
Color and Condition
Specific Gravity
Refractive Index
Water
Free Chlorides
Acidity
Dielectric Strength
Power Factor, Dielectric Constant, and Resistivity

b) Earth Refinement Response:

Consists of treatment for 2.5 hours at 50-60°C. with 0.1 to 0.2 percent by weight of properly conditioned Attapulugus clay and then filtration through dry filter paper.

c) Analysis After Laboratory Earth Refinement:

Properties Tested

Refractive Index

Water

Free Chlorides

Acidity

Dielectric Strength

Power Factor, Dielectric Constant, and Resistivity

You will be notified of the results of this test series on your sample. Then after refining your entire transformer fluid fill you can check on the results by requesting the following analysis:

Analysis 3)

ANALYSIS AFTER EARTH REFINEMENT

Total Charge: \$30.00 (This charge will not apply when analyses 1 and 2 have already been made.)

To determine whether the entire lot of the askarel fill responded to the same extent as the laboratory sample. (five-pint sample required)

Properties Tested

Color and Condition

Refractive Index

Water

Free Chlorides

Acidity

Dielectric Strength

Power Factor, Dielectric Constant, and Resistivity

To arrange for the tests described above write to the following address:

Paul G. Benignus
Monsanto Chemical Company
800 North Lindbergh Blvd.
St. Louis 66, Missouri

Samples to be tested should be clearly marked for identification and sent directly to:

Monsanto Chemical Company
W. G. Krummrich Laboratory
Monsanto, Illinois
Attention: R. Kuster

APPENDIX

APPENDIX A — Askarel Stability and Composition of Arc Formed Gas:

Askarel insulation is one of the most inert, chemically-stable heat resistant, non-corrosive liquids known. It will not break down, oxidize or sludge when exposed to air and high temperatures, 150°C. or even somewhat higher. Arcing, however, will break down the compound to liberate some hydrogen chloride and small amounts of carbon.

APPROXIMATE COMPOSITION ARC FORMED GAS FROM TRANSFORMER ASKAREL

<u>Gas</u>	<u>Amount</u>
carbon monoxide.....	0.3 per cent
carbon dioxide.....	0.3
oxygen.....	0.6
inert gases.....	1.5
hydrogen chloride.....	97.3

(note the absence of phosgene)

This arc-formed gas is non-flammable and non-combustible. These requirements must be met in accordance with the Underwriters' Laboratory for permission to use the term askarel.

Mineral oil evolves combustible hydrogen and hydrocarbon gases.

For all practical purposes, the amount of gas liberated from mineral oil or askarel under a given set of conditions is about 100 cubic centimeters per kilowatt-second.

APPENDIX B

	SOLUBILITY OF GAS IN TRANSFORMER ASKAREL			
	Percent of Gas By Volume Corrected to:			
	25°C. 760 mm		0°C. 760 mm	
	25°C.	100°C.	25°C.	100°C.
Carbon dioxide.....	71%	47%	—	—
Air.....	5.7	4.9	5.8	5.0
Nitrogen.....	6.0	4.8	5.5	4.4
Hydrogen chloride ¹	37.8	50.9	—	—

1) In absence of scavenger

APPENDIX C

APPROXIMATE VAPOR PRESSURE vs. TEMPERATURE FOR TRANSFORMER ASKAREL

<u>Temperature °C</u>	<u>Inerteen PPO, 7336-9</u>	<u>Transformer Pyranol A13B3B</u>
40	1 mm Hg.	0.9 mm Hg.
60	5	3.5
80	9	8.3
100	30	18
120	60	32
140	90	53

APPENDIX D

EFFECT OF TEMPERATURE ON DIELECTRIC STRENGTH OF ASKAREL

<u>Temperature °C.</u>	<u>Dielectric Strength</u>
-60	67 KV
-40	63
-20	57
0	55
20	50
40	50
60	48
80	45

APPENDIX E

COMPARISON OF THE APPROXIMATE VISCOSITY IN SAYBOLT UNIVERSAL SECONDS OF TRANSFORMER ASKARELS AND MINERAL OIL

<u>Temp. °C.</u>	<u>Transformer Pyranol A13B3B</u>	<u>10-C Mineral Oil</u>	<u>Inerteen PPO, 7336-9</u>
-20	1,000	1,000	2,800
0	100	150	195
20	70	85	85
40	45	49	50
60	39	40	40
80	34	34	36
100	30	30	33

APPENDIX F

THE DENSITY OF INERTEEN PPO 7336-9 AND TRANSFORMER PYRANOL A13B3B Approx. Density gm/cc.		
Temperature °C.	Inerteen PPO, 7336-9	Transformer Pyranol A13B3B
0	1.574	1.577
20	1.552	1.555
40	1.529	1.532
60	1.507	1.510
80	1.485	1.488

APPENDIX G

The thermal conductivity values of transformer Pyranol A13B3B at 27°C. and 58°C. are 26.2 and 25.8×10^{-5} calories centimeters⁻¹, degrees centigrade⁻¹, second⁻¹, respectively. Or, approximately 0.06 BTU per (hr.) (sq. ft.) (°F.) per foot. This same approximation applies to Inerteen PPO (7336-9).

APPENDIX H

Heat Capacity

Over the temperature range of 25° to 125°C. the specific heat of transformer askarel is close to 0.30 calories per gram per degree.

APPENDIX I

Coefficient of Expansion

The average coefficient of expansion of transformer askarel over the temperature range 20 to 100°C. is 0.007 cc/cc/°C. One gallon would increase to 1.056 gallons on heating from 20 to 100°C.

APPENDIX J

Fire-Resistance

To use the generic name "askarel," the fluids must be approved by the Underwriters' Laboratories as possessing adequate fire-resistance and freedom from forming explosive gases when arced. These liquids do not have a burn point (ASTM D92-33) (Cleveland open cup method) up to about 205°C., at which temperatures they begin to boil. The significance of this is that they do not burn or support combustion under conditions encountered in transformer operation. Thus the danger of secondary explosion (or fire) is eliminated.

APPENDIX K

Seals, Properties and Procurement

Dow Corning Corporation, Midland, Michigan with District's at Atlanta, Boston, Chicago, Cleveland, Dallas, Los Angeles, New York City, Washington, D. C. and Toronto has available Bulletin 09-019, August 1962 entitled "Silastic Design Data". This lists the gasket fabricators throughout the country from whom the "Silastic 50" gasketing can be purchased in sheet, extrusions or molded shapes.

Generally Silastic 50 sheet goods are stocked by local die cutters, hence, could be generally purchased locally. Usually, small quantities of gaskets are die cut. If larger quantities are needed, tools are made of the same type used to cut other elastomers.

Where the gasket is extruded for fitting into a machined groove or between gasket stops, Dow-Corning advises use of a scarved joint. This joint is then cemented using Dow Corning's Silastic 140 (clear) or their RTV 731 (white) materials, which air cure.

Dow Corning points out that the local "rubber" fabricators purchase the Silastic 50 in billet form. This is worked on a roll mill in preparation for sheeting or extrusion. Then to obtain the desired physical properties the fabricator must oven cure the Silastic 50 for 24 hours at 480°F.

SPECIFICATIONS*

	Color.....	White
	Specific Gravity at 77°F.	1.20 ± 0.02
ASTM D676 —	Hardness, Shore A. Scale.....	45 to 60
ASTM D412 —	Tensile Strength, psi. min.....	800
ASTM D412 —	Elongation, percent, min.....	250
ASTM D395 —	Compression Set after 22 hours at 300°F., percent, max.....	30

- * All physical properties measured on 0.075 inch thick samples molded 5 minutes at 240°F., and oven cured 24 hours at 480°F.

General Electric Company, Redmond Circle, Rome, Ga., uses silicone or DuPont's Viton wherever it is not possible or desirable to weld. For some small seals, where good matching surfaces are provided, Flexitallic stainless steel rings are used.

By contacting the Engineering Services Department of General Electric Company, Redmond Circle, Rome, Ga., users of Pyranol transformers made prior to development of these modern seals will obtain prompt assistance for conversion.

Users of askarel transformers made by other manufacturers should contact the original transformer manufacturer, or Monsanto for assistance in converting to these modern seals.

NOTES

HOL 000237

HOLLAN

7202-002091



MONSANTO
FUNCTIONAL FLUIDS DEPT.

800 N. LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63166

The information herein regarding obtaining optimum results from askarel fluids in your transformer has been accumulated by Monsanto for over 30 years from the experience of makers and users of askarel transformers and it is believed will be helpful.

Nothing herein shall be construed as applying to other than askarel insulation. Data and maintenance suggestions herein do not apply to the other components of the transformer. All operating and maintenance suggestions recommended by the manufacturer of the transformer should also be carefully followed.

Because these maintenance directions apply only to the askarel insulation, Monsanto disclaims any liability for damage to property or injury to persons arising from transformer operation.

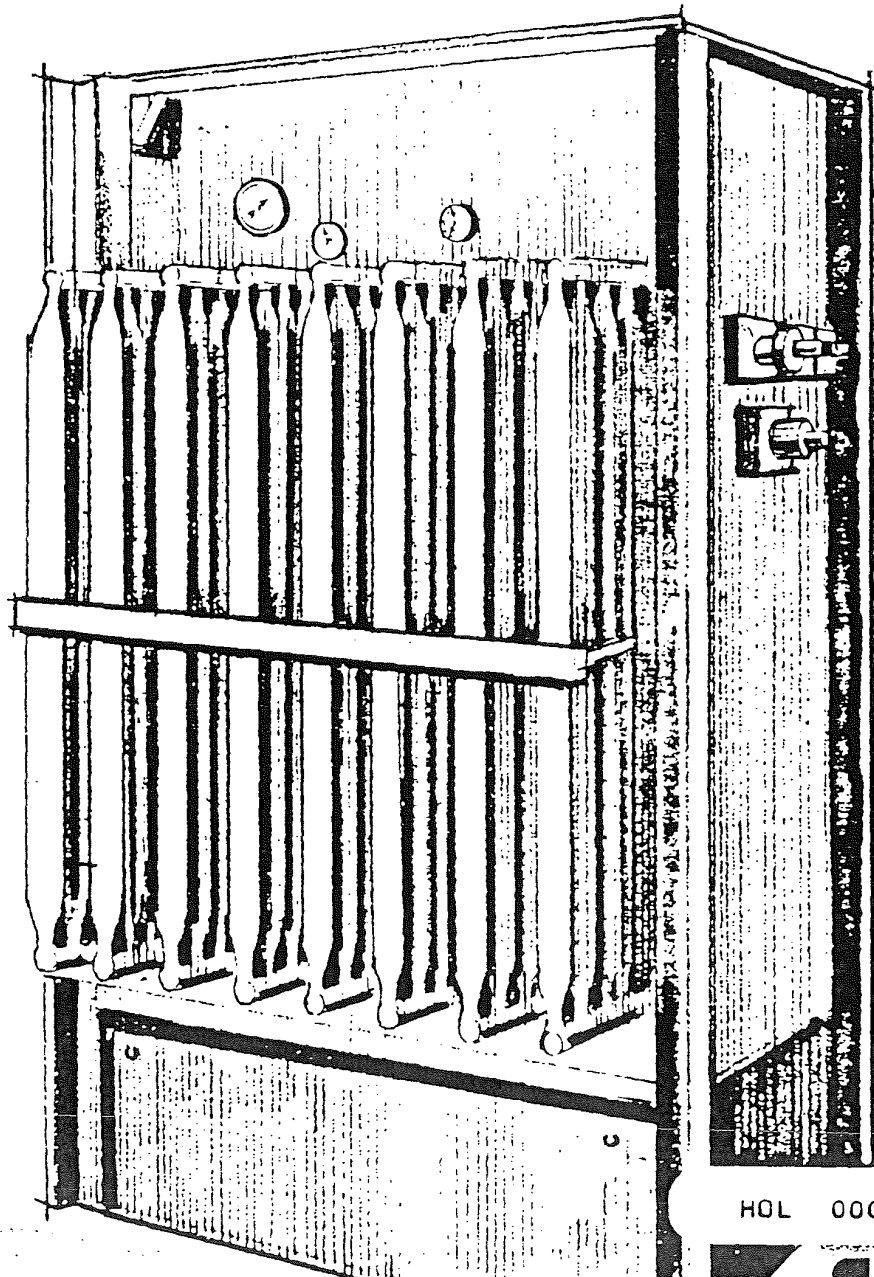
HOL 000238

HOLLAN

7202-002092

Litho in U.S.A.

when
Specifying Transformers
here's how to
get more performance
and save money



Discovery Ex. No. 16
Cause No. C-91-78
Roger Holland v. Monsanto
6-27-91 SB

Monsanto

HQL 000352

O/FF-14

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WATER_PCB-SD0000059690

ASKAREL

the fire-resistant dielectric
preferred by specifiers
who want to save money now
and for years to come

askarel fire-resistant transformers offer

Lower Operating Costs

due to lower power losses

High Impulse Strength

giving a margin of safety against transformer failure

Low Maintenance Costs

install them and leave 'em alone

Low Installation Costs

place them where YOU want them placed

Fire Resistance

askarel provides safety from fire

Quietness

naturally designed to be quieter than open dry types

Reliability

more than 30 years of trouble-free operation

HOL 000353

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1/76

**For
additional
information!**

Fill out the business reply in
the back of this brochure
and drop it in the mail . . .
no postage required.

HOL 000354

why askarel...

For almost 40 years askarel transformers have served the commercial, industrial and utility fields faithfully with safety, economy and reliability. They are built to exact specifications by all major electrical equipment manufacturers.*

Mineral oil transformers can catch fire. When used in confined or populated areas, they require fire walls, vaults, and sprinkling systems; or they must be located at a more remote point requiring long expensive low-voltage lines.

Open dry type transformers are limited in flexibility of location. Supplemental installation costs usually run much higher than with askarel units, especially if sound-deadening or enclosing from atmospheric contamination and moisture is required. They are less dependable than askarel units because they are affected by corrosive atmospheric conditions. Due to the nature of open dry type units, they can require a great deal of maintenance; have a high noise level, and are expensive to operate because of higher load losses and frequent maintenance requirements.

Askarel units deliver a steady power flow year after year, offering lower operating and maintenance costs, quietness and dependability. They are fire-resistant and allow you to place them where YOU want them placed, right at the point of use if you choose. Think of the savings in installation alone!

Askarel will not oxidize or sludge; remains chemically stable when subjected to elevated temperatures and will not corrode metals.



Monsanto has manufactured and supplied askarel fluids since the askarel type transformer was first introduced. The askarel fluid insulation is supplied under various trademarks such as "PYRANOL" (General Electric); "INERTEEN" (Westinghouse); "CHLOREXTOL" (Allis-Chalmers); "NO-FLAMOL" (Wagner Electric). Many other manufacturers such as I-T-E use the generic name, askarel. In all cases, Monsanto makes the askarel fluid for these transformers.

HOL 000355



HOLLAN

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WATER_PCB-SD0000059693

askarel fire-resistant transformers operate less expensively than other types due to lower core and coil losses

IT'S JUST LIKE GETTING
A FREE TRANSFORMER
IN ABOUT 10 YEARS!

TYPICAL EXAMPLE

1,000 KVA, 3 phase, 60 cycle, 13,800 to 480 Y volts.
Transformer first cost assumed about \$8,500.

UNIT	CORE LOSS (at 100% Load) (Watts)	COIL LOSS (Watts)
Open Dry Type	4,200	18,500
Askarel Unit	2,900	12,500

(A) Based on a 75% load factor, coil losses are approximately as follows:

Open Dry Type... $18,500 \times (.75)^2 = 10,400$ watts
Askarel Type... $12,500 \times (.75)^2 = 7,000$ watts

Coil Loss Difference... 3,400 watts

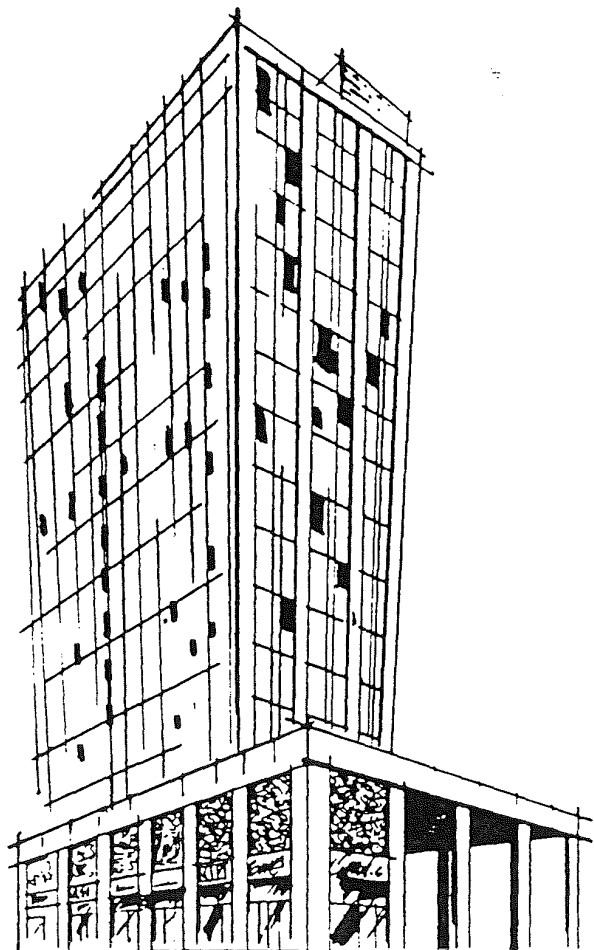
Total Core and Coil Loss Difference
in favor of Askarel... 4,700 watts

Based on an 8,700 hour year operation:
 $4,700 \times 8,700 = 41,000$ KWHR (Approx.)

Assuming power cost is \$0.015 per KWHR:
the savings each year is \$615.00... or the
Askarel Transformer first cost is paid for in
about 10 years.*

*This annual savings compounded at 6% per year.

Incorporate your own figures in the following example and prove this point to yourself. The figures shown assume the same first cost of an askarel transformer and an open dry type unit. (Askarel transformers are now quoted at the same price as 150°C. open dry types.)



HOL 000356

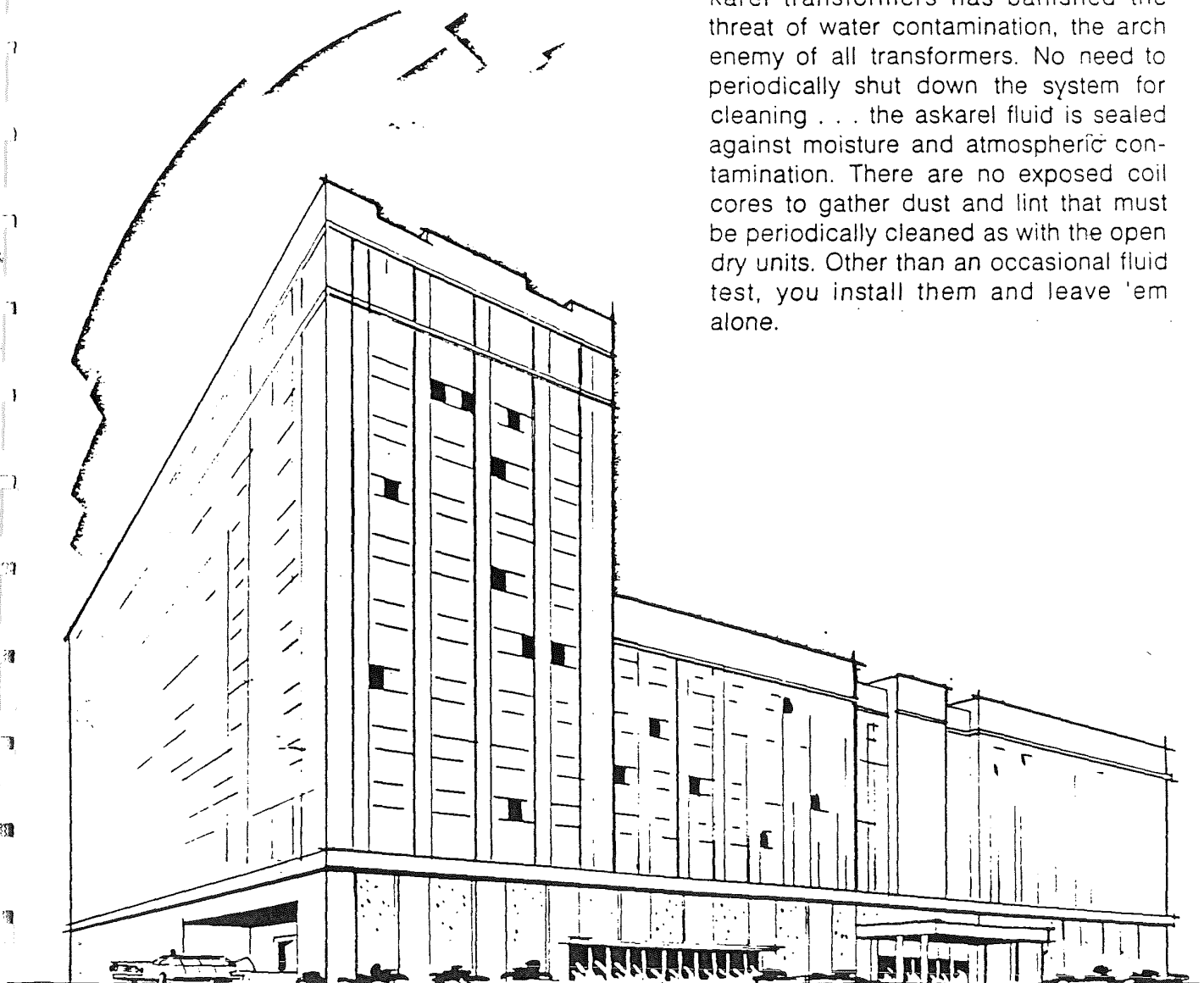
HOLLAN

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askarel fire-resistant transformers offer easy maintenance

LOW MAINTENANCE MEANS GREATER SAVINGS IN TIME AND MONEY!

Askarel transformers are easiest to maintain. Proper sealing of modern askarel transformers has banished the threat of water contamination, the arch enemy of all transformers. No need to periodically shut down the system for cleaning . . . the askarel fluid is sealed against moisture and atmospheric contamination. There are no exposed coil cores to gather dust and lint that must be periodically cleaned as with the open dry units. Other than an occasional fluid test, you install them and leave 'em alone.



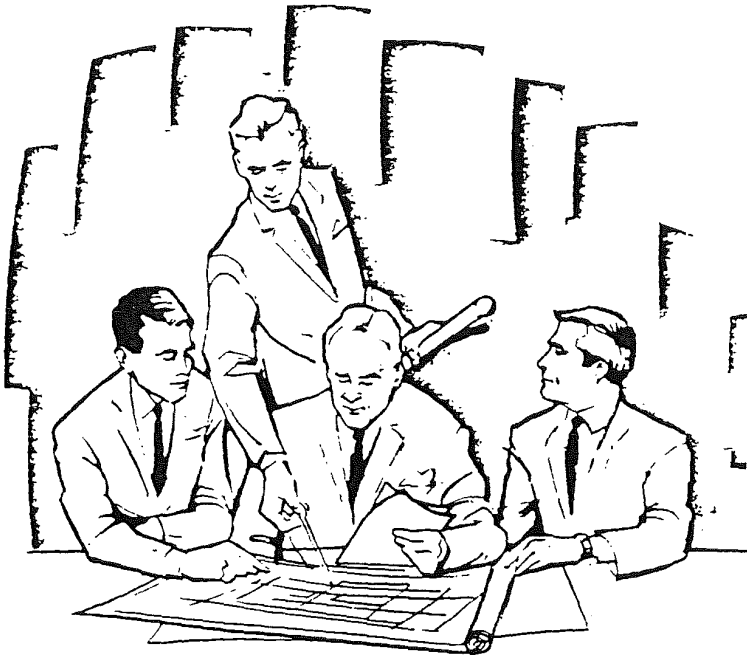
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WATER_PCB-SD0000059695

askarel fire-resistant transformers can give you lower installation costs



PLACE THE ASKAREL TRANSFORMER WHERE AND WHEN YOU WANT IT PLACED!

Because of the unique features of askarel transformers, you can place them where and when YOU want them placed . . . right at the point of power usage if you desire. You do not have to wait until other phases of construction are completed. No added expenses are necessary to protect it from contamination, subdue the sound level or run expensive lines from distant locations. You place it where your system dictates, not where the transformer dictates.

The start-up costs for askarel transformers are almost nil. Because they are sealed, there is no expensive clean-up and drying out required prior to starting. Just bring it in, hook it up and start operating. This alone offers a big savings.

askarel transformers offer fire safety

ASKAREL FLUIDS ARE FIRE-RESISTANT!

The fluid is fire-resistant and does not support combustion. Just as important, the fluid will not carry or add burning oil hazards to fires which may start from other causes. The liquid does not deteriorate when exposed to heat or hot metal; it does not decompose over long periods of time. Municipal codes also tend to favor askarel transformer installations over other types.

HOL 000358

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askarel fire-resistant
transformers are quieter

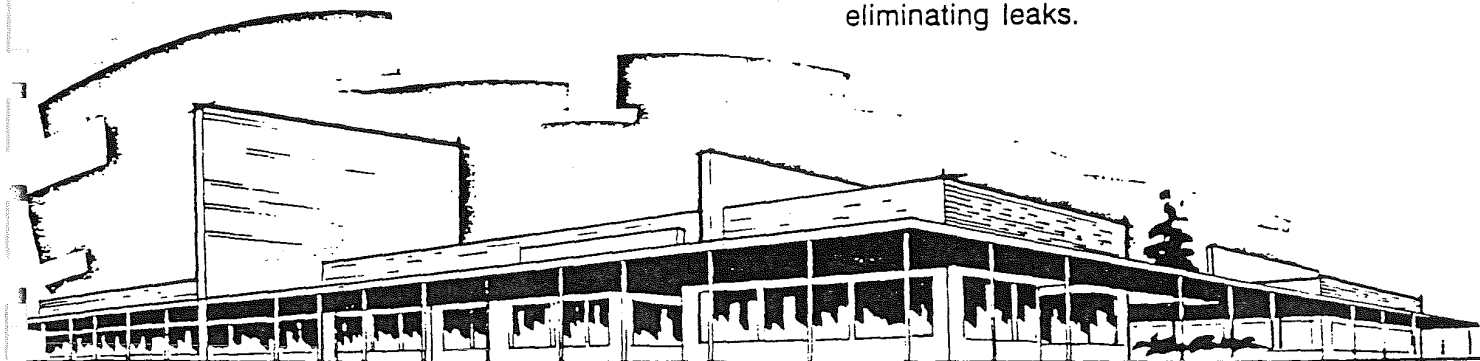
CHECK THE STANDARDS!

Open dry types produce a higher noise level, requiring expensive sound-suppressing additions or location far from the point of power usage. Wherever the sound level is a factor, askarel transformers rate quieter than comparable open dry type units . . . 3 to 6 decibels is a major reduction in discernable sound level.

askarel fire-resistant
transformers are reliable

THERE ARE MANY EXAMPLES OF OVER 30 YEARS OF TROUBLE-FREE OPERATION!

A properly designed and installed askarel transformer will give long years of trouble-free service . . . many in operation for over 30 years. This fact has been proven in installations throughout the world. Even longer life can now be expected due to more modern design practices in sealing out moisture and eliminating leaks.



HOL 000359

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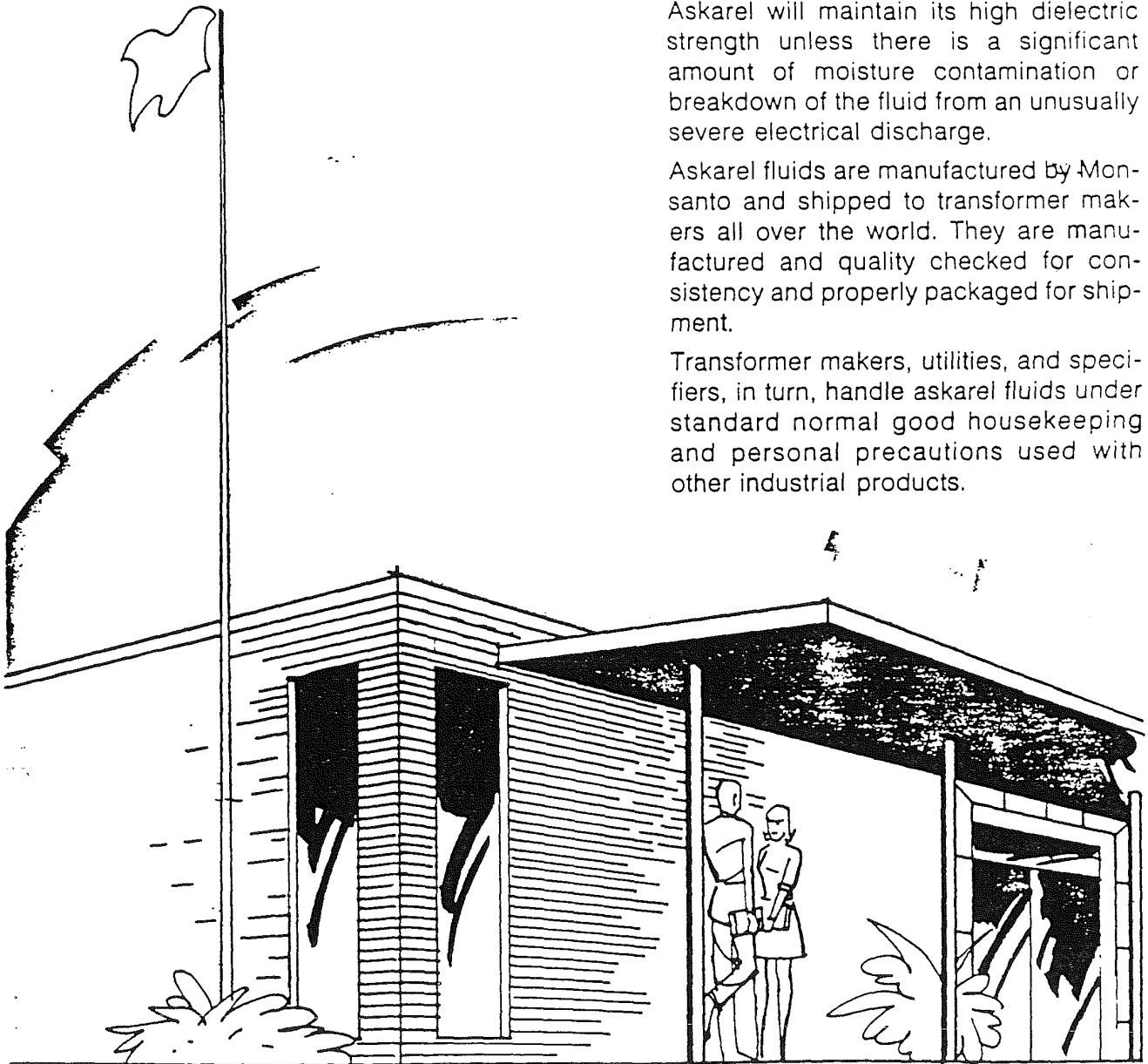
7202-002213

askarel fluids maintain high dielectric strengths

The most significant and reliable measurement of transformer askarel electrical performance is its dielectric strength. Askarel will maintain its high dielectric strength unless there is a significant amount of moisture contamination or breakdown of the fluid from an unusually severe electrical discharge.

Askarel fluids are manufactured by Monsanto and shipped to transformer makers all over the world. They are manufactured and quality checked for consistency and properly packaged for shipment.

Transformer makers, utilities, and specifiers, in turn, handle askarel fluids under standard normal good housekeeping and personal precautions used with other industrial products.



HOL 000360

HOLLAN 7202-002214

WATER_PCB-SD0000059698

before you specify... consider askarel transformers

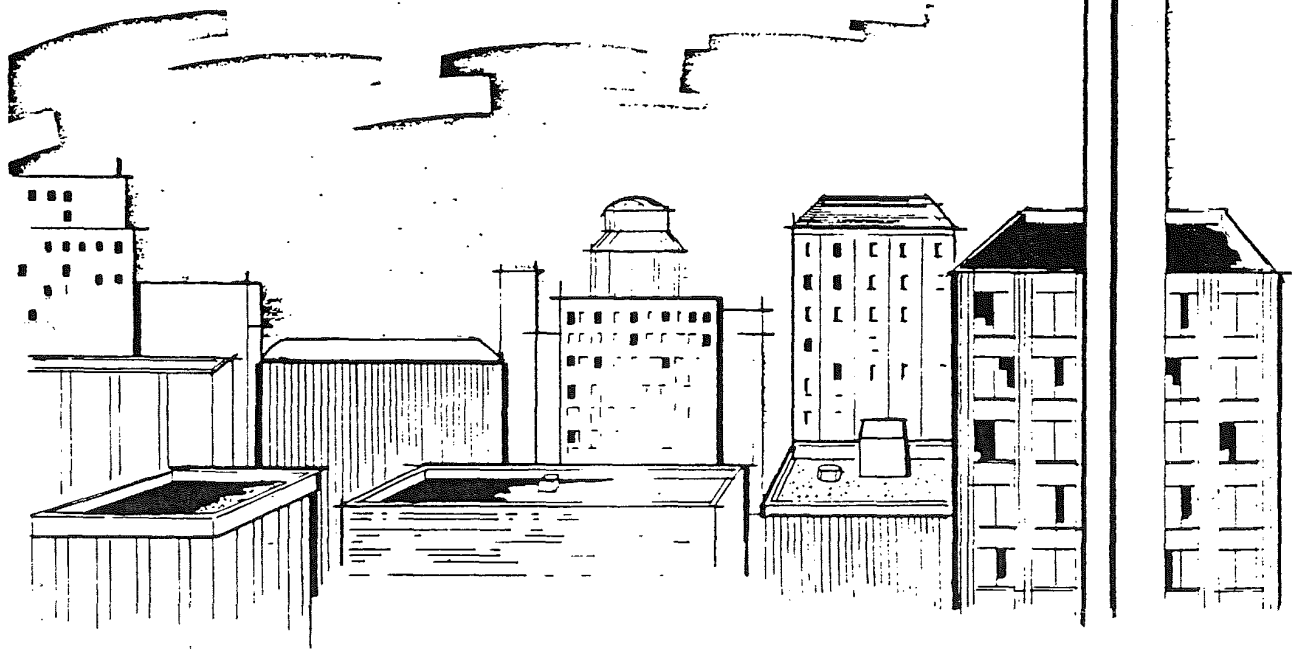
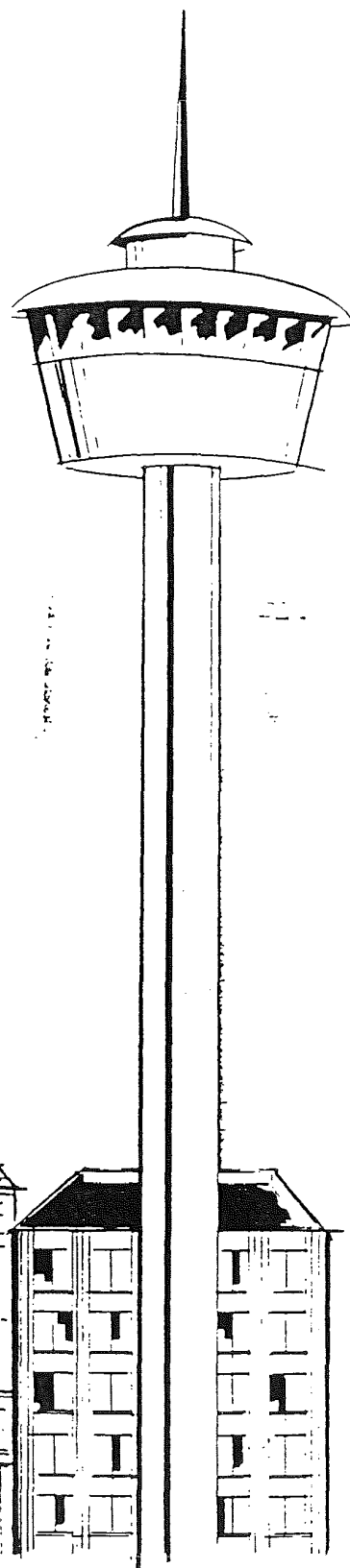
Operating with askarel fire-resistant transformers is the safest, easiest and often the least expensive way to distribute electrical power. Your transformer supplier can give you the complete story on his askarel transformers. Be sure to check with him soon . . . specifying askarel transformers is your best bet when your plans call for transformer equipment in . . .

Industrial Unit Substations, Load Centers, Power Centers . . . in factory areas where maximum safety from fire is required and where atmospheric contamination may exist.

Utility Networks . . . where safety and space is a consideration.

Institutions and Office Buildings . . . schools, hospitals, hotels, shopping centers, apartments, etc. where maximum safety, low noise levels and space is a prime factor.

In any electrical system . . . where you are charged with the responsibility of providing the best installation available at the lowest overall installation and operational cost.



HOL 000361

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7202-002215

send for detailed
information...



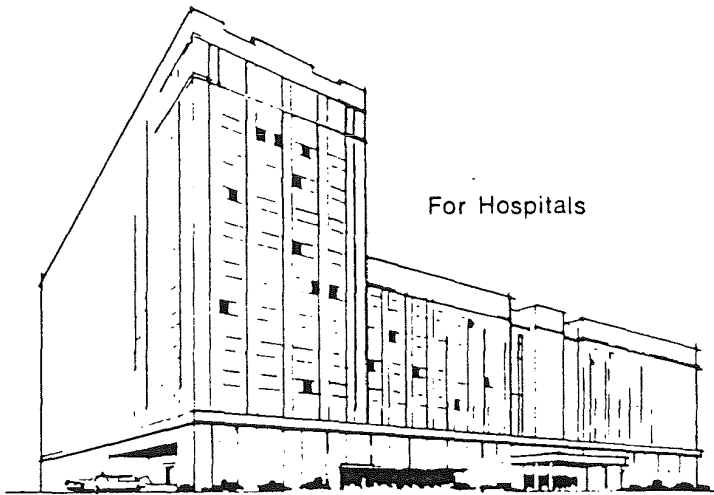
Monsanto will be happy to supply you with a copy of "The Care and Grooming of Askarel Transformer Fluid" or "Monsanto Askarel Inspection and Maintenance Guide." Ask your supplier to get your copy for you, or simply return the attached business reply card.

HOL 000362

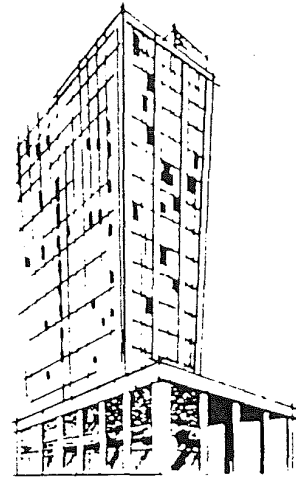
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7202-002216

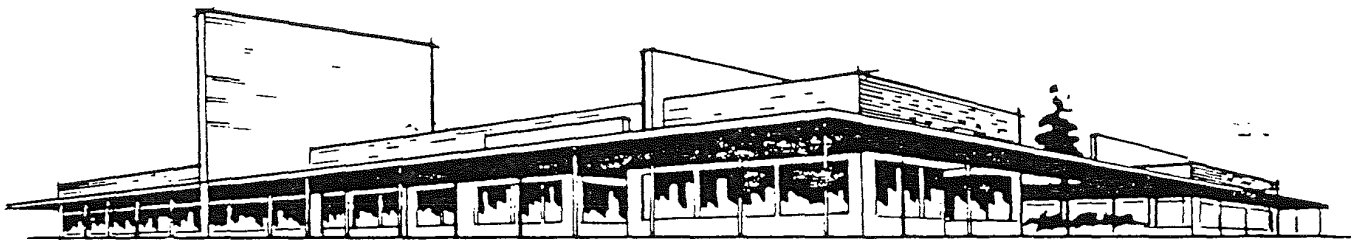
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For Hospitals

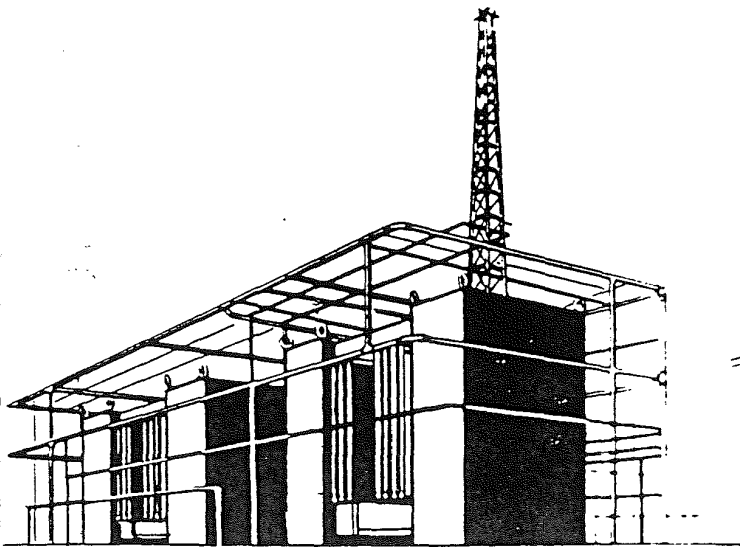


For High-rise Buildings

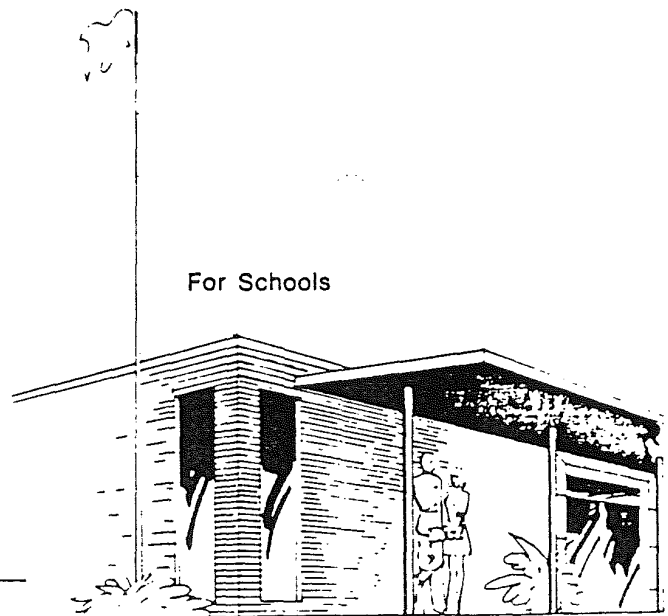


For Shopping Centers

specify askarel
for your next job!



For Industrial Load Centers



For Schools

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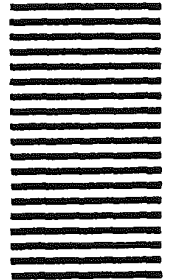
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St. Louis, Missouri 63166

Please send the literature checked

- ☐ The Care & Grooming of Askarel Transformer Fluid
☐ Askarel Inspection & Maintenance Guide

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Company _____

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City/State/Zip _____

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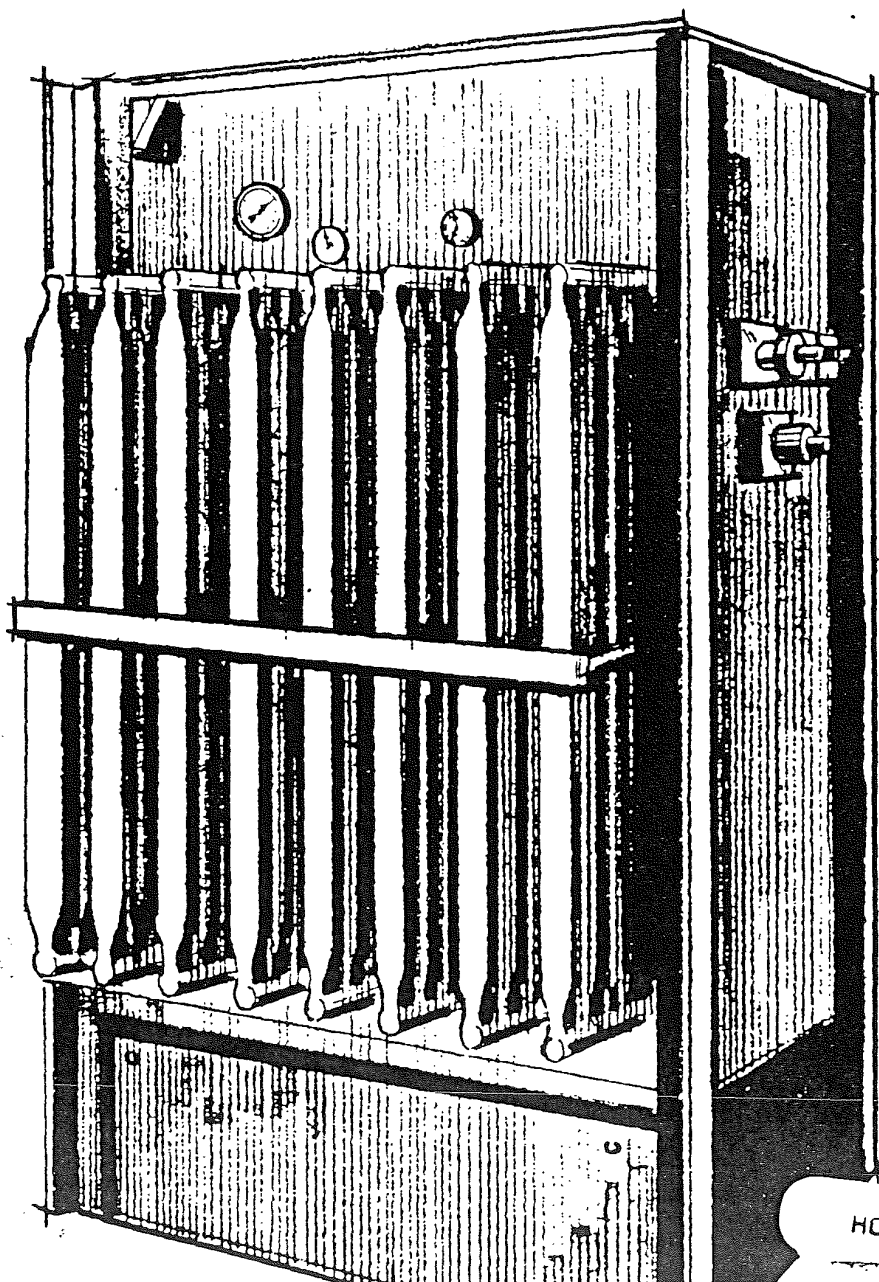
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7202-002220

WATER_PCB-SD0000059704

when specifying Transformers here's how to get more performance and save money



Discovery Ex. No. 17

Cause No. C-91-78

Roger Holland v. Monsanto

6-27-91 SB

Monsanto

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7202-002158

O/FF-14

HOL

000304

SKAREL

the fire-resistant dielectric
preferred by specifiers
who want to save money now
and for years to come

askarel fire-resistant transformers offer

Lower Operating Costs

due to lower power losses

High Impulse Strength

giving a margin of safety against transformer failure

Low Maintenance Costs

install them and leave 'em alone

Low Installation Costs

place them where YOU want them placed

Fire Resistance

askarel provides safety from fire

Quietness

naturally designed to be quieter than open dry types

Reliability

more than 30 years of trouble-free operation

HOL 000305

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7202-002160

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HOL 000307



HOLLAN

7202-002161

askarel fire-resistant
transformers operate less expensively
than other types due to
lower core and coil losses

IT'S JUST LIKE GETTING
A FREE TRANSFORMER
IN ABOUT 10 YEARS!

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TYPICAL EXAMPLE

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Transformer first cost assumed about \$8,500.

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Open Dry Type $18,500 \times (.75)^2 = 10,400$ watts
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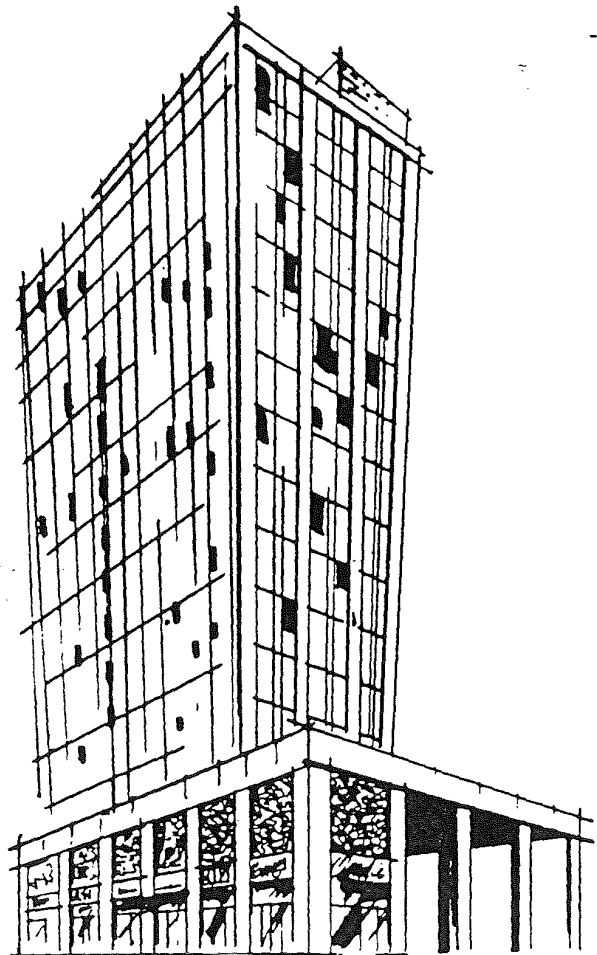
Coil Loss Difference . . . 3,400 watts

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Assuming power cost is \$0.015 per KWHR:
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Askarel Transformer first cost is paid for in
about 10 years.*

*This annual savings compounded at 6% per year.



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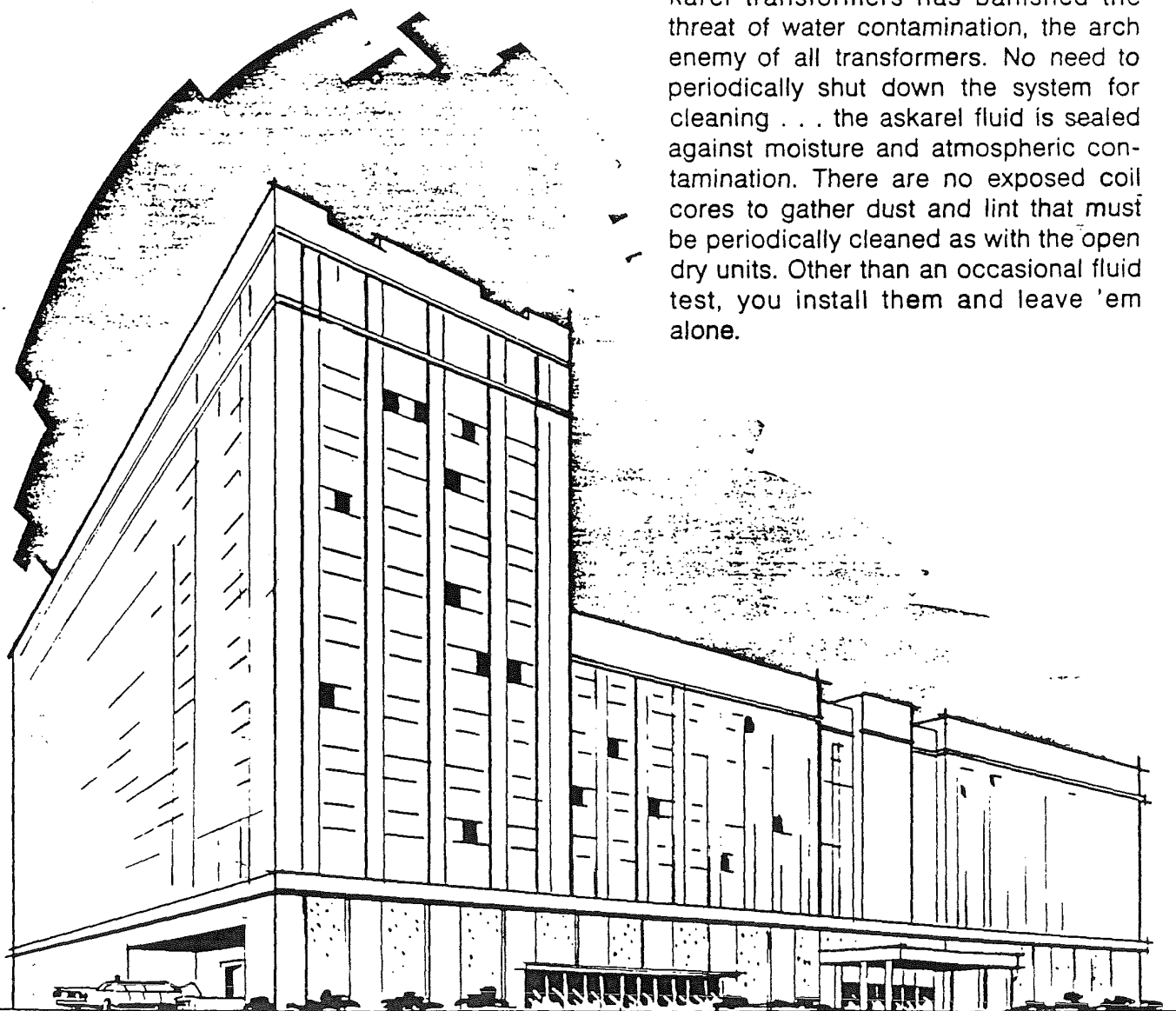
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WATER_PCB-SD0000059709

askarel fire-resistant transformers offer easy maintenance

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HOL 000309

HOLLAN

7202-002163

askarel fire-resistant transformers can give you lower installation costs

PLACE THE ASKAREL TRANSFORMER WHERE AND WHEN YOU WANT IT PLACED!

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HOL 000310

HOLLAN

7202-002164

askarel fire-resistant
transformers are quieter

CHECK THE STANDARDS!

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HOL 000311

HOLLAN

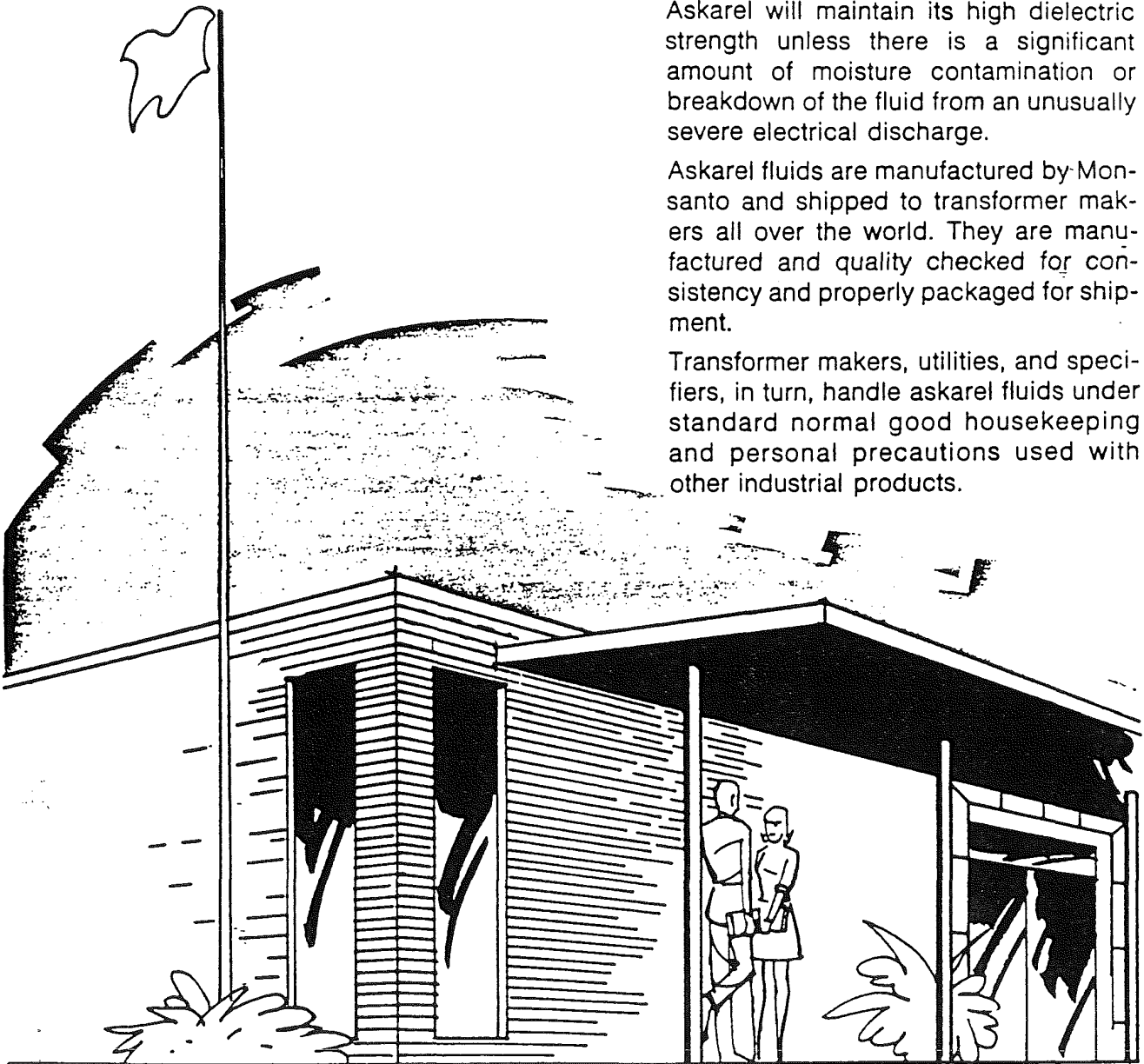
7202-002165

askarel fluids maintain high dielectric strengths

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HOL 000312

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7202-002166 —

before you specify... consider askarel transformers

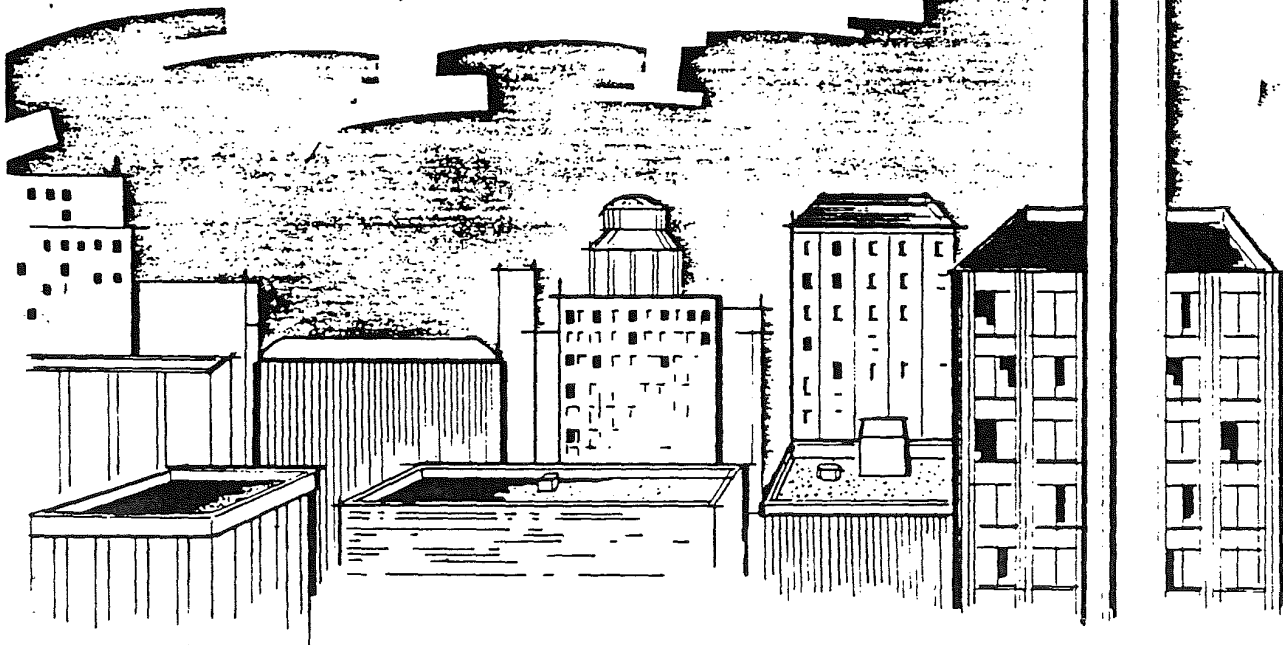
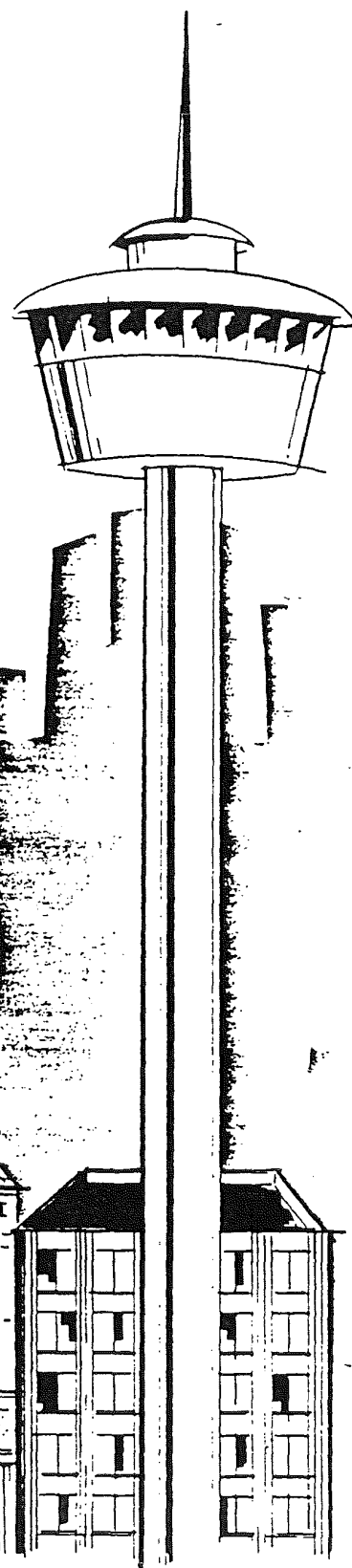
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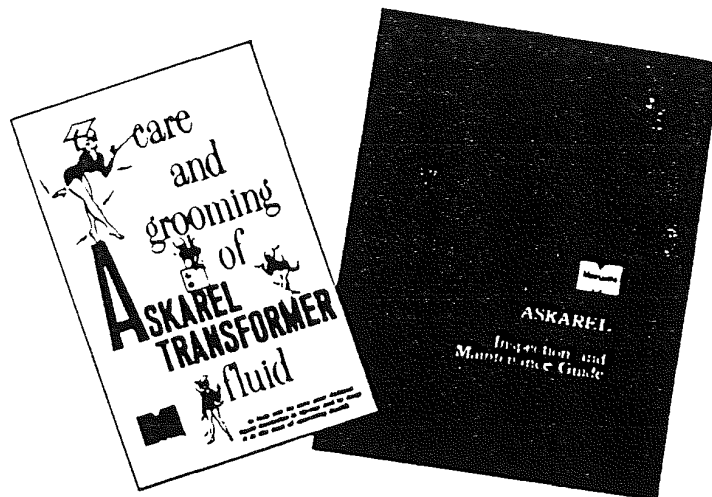


HOL 000313

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send for detailed
information...



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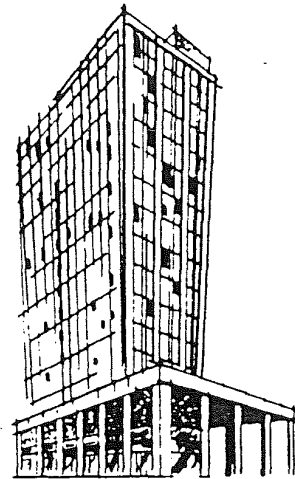
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7202-002169

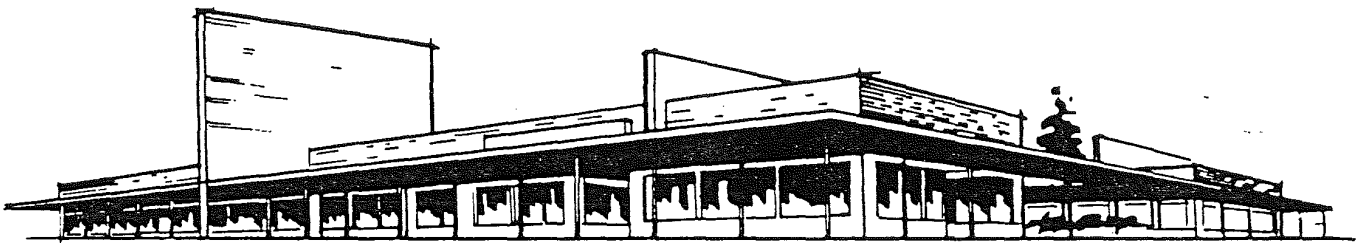
WATER_PCB-SD0000059716



For Hospitals

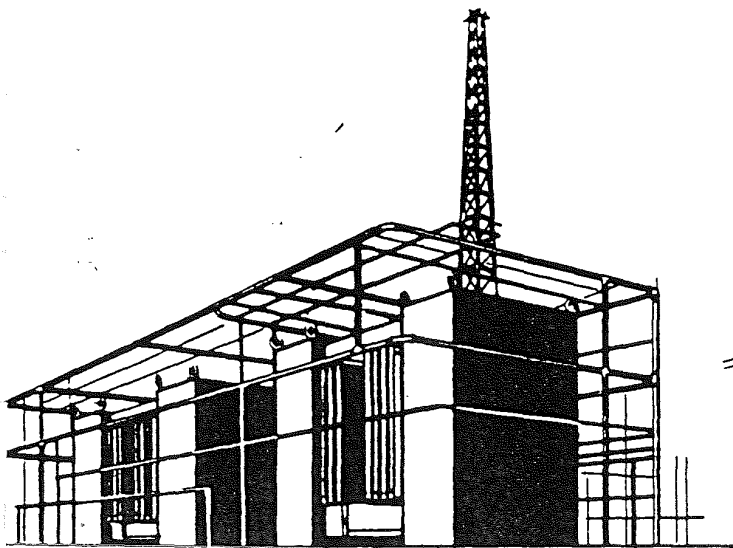


For High-rise Buildings

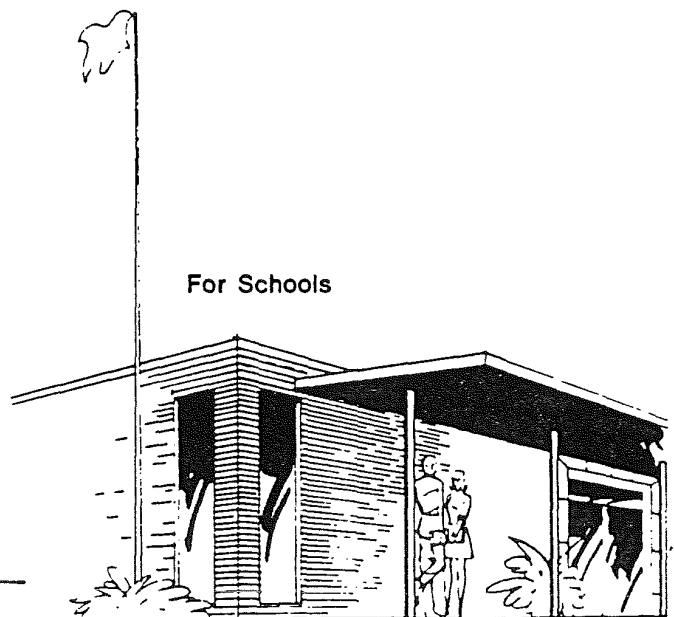


For Shopping Centers

specify askarel
for your next job!



For Industrial Load Centers



For Schools

HOL 000317

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7202-002171

WATER_PCB-SD0000059717

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HOL 000318

869-IGI-LPA



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7202-002172

WATER_PCB-SD0000059718

Discovery Ex. No. 18
Cause No. C-91-78
Roger Holland v. Monsanto
6-27-91JB



Monsanto ASKAREL

Inspection and Maintenance Guide

HOL 000272

HOLLAN

7202-002126



ASKAREL

Inspection and
Maintenance Guide

HOL 000273



HOLLAN

7202-002127

WATER_PCB-SD0000059720

SECTION B
ASKAREL FILLED SWITCHES AND TERMINAL CHAMBERS

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HOL 000275



HOLLAN

7202-002129

Askarel liquid insulation is made by thinning Aroclor 1260 with trichlorobenzene or tri-, tetrachlorobenzene mix. The first transformer askarel was made in 1932, in accordance with General Electric Company's patents, and was trademarked Pyranol 1488. Westinghouse, too, offered this askarel insulation in 1936 under their trademark Inerteen.

In the mid-1940's, as shown in the following table, tin tetraphenyl was added to General Electric's Pyranol to scavenge hydrogen chloride. Shortly thereafter, Westinghouse added phenoxy propene oxide to Inerteen for the same purpose. In 1963, General Electric replaced tin tetraphenyl with a diepoxide scavenger. This new formula, which replaces previous Pyranols, is called Transformer Pyranol A13B3B. *Thus, today the two commercial types of formulations are General Electric's Transformer Pyranol A13B3B type and Westinghouse Inerteen PPO (7336-9) type.*

The composition changes made in transformer askarel formulations are shown in Table I.

Table I THE COMPOSITION OF TRANSFORMER ASKARELS						
	Pyranol				Inerteen	Inerteen PPO (7336-9)
	1488	1467	1470	A13B3B	Inerteen	
Year Introduced.....	1932	1944	1952	1963	1936	1945
Ingredients:						
Aroclor 1260.....	60	60	45	45	60	60
Trichlorobenzene.....	40	40	40	40	40	40
Tetrachlorobenzene.....			15	15		
Tin tetraphenyl.....		0.125	0.125			
Phenoxy propene oxide.....						0.20
Diepoxide.....				0.125		

OTHER BRAND NAMES

Various electrical equipment manufacturers use other trade-marked names for askarel liquid insulation, such as Chlorextol (Allis-Chalmers); Noflamol (Wagner Electric); Saf-T-Kuhl (Kuhlman Electric). These askarel insulating liquids are one or the other of the two standard formulations. Still other manufacturers, who designate their insulation only by its generic name, askarel, assign it a number or code. By this number, Monsanto knows whether to furnish Pyranol A13B3B or Inerteen PPO (7336-9) type formulation to the user.

III. OFFICIAL TRANSFORMER ASKAREL SHIPPING SPECIFICATIONS

The official shipping specifications for the two modern transformer askarel formulations are shown in Table II.

HOL 000277



IV. INTERCHANGEABILITY AND STABILITY

A. Interchangeability:

The two general types of askarel insulation shown in Table II can be either mixed or interchanged and there will be no difference in the operation of the transformer. However, askarel insulation *must never be mixed* with mineral oil.

Over 2% mineral oil in askarel begins to lower its fire resistance. Further, materials of construction in the transformer that are compatible with askarel may not be compatible with oil and vice-versa. For example: a significant amount of askarel in a transformer built for mineral oil will attack gaskets, adhesives, core bindings, impregnating varnishes, etc.

B. Stability:

Askarel liquid insulation is highly pure, fire-proof liquid made under close chemical control. It does not vary in composition like the commercial range of mineral oils.

Askarel does not deteriorate when exposed to air, heat, hot metal; it does not break down over long use to form conducting or corrosive chemicals; it does not oxidize or sludge. Askarel will remain perfectly stable year after year unless broken down by exposure to severe arcing.

The only real "enemy" of askarel is *contamination by water*. Keeping askarel water-free will insure long-time service.

Askarel is heavier than water. If water gets into askarel insulation, only a tiny amount (125 ppm) dissolves — the rest floats on top.

V. DIRECTIONS FOR HANDLING

A. Keep Dry:

In handling, storing, sampling, inspecting askarel — and in operating askarel transformers — take every precaution to guard the askarel insulation from exposure to high humidity and moisture contamination. Keep 5, 30, or 55 gallon drums of askarel dry; lay stored drums on their sides with the bung at the highest point from floor to keep water off the drum head (which can be sucked into the askarel by the drum "breathing"). This precaution is not necessary when drums are stored indoors, which is the preferred way of storing.

B. Use Ordinary Personal Precautions:

Transformer askarel has been made, handled, and used for over 30 years without causing toxic or other ill effects. It can be handled with only minor precautions. If accidentally spilled on hands, no serious skin irritation will occur. However, liquid askarel has a solvent action (similar to paint thinner) on the fats and oils of the skin and prolonged contact may lead to drying and chapping of the skin.



Table III
RELATION OF "BREAKDOWN STRENGTH" TO AMOUNT
OF DISSOLVED WATER IN ASKAREL AND MINERAL OIL

Water Content (PPM)	Breakdown Voltage (ASTM)	
	Askarel	Mineral Oil
0	70 KV	50 KV
20	55	39
40	47	30
60	40	26
80	38	22
110	10	5

Table IV
APPROXIMATE SOLUBILITY OF WATER IN TRANSFORMER
ASKAREL AND MINERAL OIL

Temperature		Amount of Water (PPM) Dissolved	
°C.	°F.	Askarel	Mineral Oil
-30	-22	8	8
-20	-4	16	10
-10	14	28	13
0	32	41	20
10	50	65	33
20	68	94	58
30	86	128	85
40	104	170	130

TURBIDITY

... may be the visual sign of undissolved water, or may indicate contamination from core materials, dirt, or deteriorating construction materials. Cloudiness may also result from cold precipitation of tin tetraphenyl "scavenger" that was used in the earlier Pyranols. This scavenger begins to come out of solution around 15°F. above zero. To redissolve it requires heating to 150 - 200°F. and agitation.

High dielectric strength will quickly indicate that any turbidity present is not moisture; that the insulating efficiency of the askarel is still excellent. However, if the dielectric strength is below 26 KV, moisture should be determined, using the Karl Fischer method (ASTM D1533-60).

The dielectric strength test for askarel serves primarily as an indicator for moisture. It is by far the most important maintenance test for transformer askarel.

VIII. TYPICAL VALUES FOUND IN ASKAREL FLUID UNDER VARIOUS USE CONDITIONS

Table V. gives the entire spectrum of properties that are typical for freshly-made transformer askarel as it goes through the various normal and abnormal conditions of use.

The data in Table V are in terms of *only* the askarel *fluid* and do not refer to insulation resistance or power factor measurements on the over-all transformer insulation.

Several utilities studying the power factor values of the over-all transformer insulation system indicate that the unit power factor of a new askarel transformer should range from 1% to not over 5%. This would generally correspond with the askarel *fluid* properties as given under heading "B".



Starting ideally with situation "B", it is normal to expect the power factor of the fluid in a satisfactorily operating askarel transformer to increase as shown under heading "C". The "over-all" power factor of the transformer in normal service is expected to rise, but preferably not much beyond 5%. In this normal situation, the moisture level of the askarel fluid and its dielectric strength will be satisfactory, as shown in heading "C".

Occasionally the power factor of a non-arc'd, satisfactorily-operating askarel transformer is found to be relatively high, i.e., 15%. In this case, the power factor of the askarel fluid will also be high, perhaps as high as 50% at 20°C. and 60 cycles.

It is not good practice merely to note that high power factor of the askarel fluid is to be expected. The important step is to check dielectric strength and note whether there has been a downward trend. A downward trend in dielectric strength very likely indicates moisture entrance and should be confirmed by a Karl Fischer test for water.

The importance of any abnormalities in dielectric strength and moisture content of the askarel fluid cannot be overemphasized! Where abnormal values for the dielectric strength or moisture content occur, the power factor of the transformer can be expected to be abnormally high; the expected high power factor of the askarel fluid will induce this.

The indication that a high power factor on the transformer and on the fluid is due to contamination can be verified by earth refining the askarel fluid and noting whether after refining the test results correspond with heading "E".

Assuming no mechanical defect or arcing, if the power factor of a new askarel transformer is relatively high, the power factor of the fluid will also be high, giving the situation under heading "D". This reflects contamination that should have been removed by the manufacturer of the transformer.

In absence of mechanical defect, where there are no abnormal losses in dielectric strength, and no moisture pick-up in non-arc'd askarel — the use history shows that a relatively high power factor for the askarel fluid (as compared with mineral oil) is to be expected. Normally, high power factor is due to contamination and not deterioration of the askarel operation.

As shown by F. M. Clark in his book, "Insulating Materials For Design and Engineering Practice," John Wiley & Sons, N. Y., 1962 — activated alumina can be used in the circulating system to bring the power factor down and keep it as low as possible.

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- 4. Gaskets For Hand-Hole Covers:** Modern design specifies silicone gaskets. Such gaskets must be retained in a groove. The groove preferably is machined into the flange or cover. However, it can also be formed by welding concentric steel strips to the flange or the cover.

Generally the gaskets should be $\frac{5}{16}$ to $\frac{1}{2}$ inch thick for covers, depending on the depth of the groove. A rectangular section is usually used.

The silicone material should be Dow-Corning No. 50 Silastic or equivalent. This is a low compression set material. For best sealing 20 to 25% compression is recommended, with ample clearance in the groove to allow for this compression.

No cement is required. With reasonable care the gasket is removable without damage and is reusable.

Silastic 50 is slightly swelled by askarel which contributes to the tightness of the seal. It is not deteriorated by askarel fluid or vapors. It resists weathering and it is thermally stable and flexible at all operating temperatures. It is an excellent moisture barrier.

- Notes: a. Dow-Corning, Midland, Michigan will supply a list of Silastic 50 gasket fabricators to all transformer manufacturers or users. They will also furnish technical data.
- b. Any user of Pyranol transformers, made by General Electric Company at Rome, Ga., will receive prompt and generous help for converting to the modern silicone or Viton gaskets by contacting the General Electric Company's Service Engineering Department at Rome, Ga.

See Appendix K: Seals, Properties and Procurements.

C. The Older Sealing Arrangements:

The older type gaskets consist of either cork or cork-nitrile rubber combinations or straight nitrile rubber.

- 1. Cork-Nitrile Combinations:** Covers for the main tank, hand-holes, switch and terminal chambers, relief diaphragms etc. are held in place by studs welded to the flange or by bolts. The gaskets are cut with openings and placed over the bolts. Often Shellac (Westinghouse Style No. 1150419, or General Electric Company's Glyptal 1276) is used to cement the cork to the flanges.

The following is recommended for sealing with the cork — nitrile rubber combination:

Use Armstrong NC-757 cork-nitrile material or equivalent. The gasket can be cut from a single sheet or by scarfing strips of the material. A convenient method for joining strips is to make a Keystone Type joint. For this, Westinghouse, Sharon, Pa., offers their gasket cutter Style No. 328 B614 G01, (about \$15).

The joints should be cemented and the gasket also cemented to the flange, using one of the above cements. Excess cement should not be allowed to reach the interior of the transformer.

XI. INSPECTION CHECK LIST

1. If askarel is clear, even though darkened to light brown; has no sediment or turbidity; has dielectric strength over 26 KV . . . give it the inspection "OK".
2. If askarel is clear; has foreign color of blue, green, red . . . it is "extracting color" from internal materials. This is not, of itself, an operating hazard when the dielectric strength stays over 26 KV and moisture remains low. However, this rare occurrence calls for checking into condition of the interior construction and consulting the transformer maker.
3. If askarel is clear; but dielectric strength drops to 22 or lower KV, and moisture rises over 80 ppm . . . the askarel is ready for simple "refining". If the moisture is near the saturation level (about 125 ppm), a thorough inspection should be made for water droplets in the transformer tank, and even for "globules" or water floating on the askarel surface. If found, the transformer manufacturer should be consulted for reconditioning both the transformer and the fluid.
4. If askarel is dark brown to black; if black particles of carbon are seen; and dielectric strength is low . . . the askarel has been broken down by arcing. It cannot be refined and should be discarded.

If any of these four simple inspection tests appear out of the ordinary, or the relationship between appearance and test values is abnormal — contact your transformer supplier for a complete analysis.

Whenever a sample is to be shipped to Monsanto, please follow the directions shown under: "SAMPLING ASKAREL".

XII. CONTAMINATION IN TRANSFORMERS

Unlike mineral oil which can oxidize, sludge and deteriorate — askarel breaks down in transformer use *only when strongly arced*.

Thus, while askarel does not decompose in normal use — it can be contaminated more readily than the relatively non-polar mineral oil.

For example the following Table VI shows how a small amount of synthetic rubber or a bit of varnished cloth markedly increases the power factor of the askarel. Please note, however, that *such minor contamination has no adverse effect on the dielectric strength*. As explained, moisture entrance through faulty seals seems the only contaminant in normal use that lowers the dielectric strength of transformer askarel.

XIII. REFINING ASKAREL FOR RE-USE

A. Filtering Through Dry Blotter Paper to Remove Moisture and Extraneous Particles:

Most operators prefer portable refining apparatus, such as a plate press fitted with a dolly, (available from Sparkler, Mundelein, Ill., Westinghouse Maintenance and Repair Dept., Chicago, or General Electric Co., Pittsfield, Mass.); or the earthen cartridge filter type, (available from Industrial Filter Corp., Lebanon, Ind.). Filter paper liners for the plate press are available from Carl Schleicher and Schuell Company, Keane, New Hampshire and manufacturers of filter presses listed above.

The filter paper must be dried immediately before use. For best results, spread the paper for maximum surface exposure in a hot air circulating oven and heat it for 4 to 6 hours at 110°C.

If possible do not take the transformer out of service until ready to filter the fluid. This will keep the transformer coils relatively hot and dry. Processing the fluid should start immediately after de-energizing the unit.

Circulate the askarel hot (but not over 55-60°C.) through the filter fitted with the dry paper liners.

After filtration the dielectric strength of the askarel should be 35 KV minimum.

1. **Precautions:** Filtering should not be done when the relative humidity exceeds 75%.
2. Any flexible hoses and gaskets on the refining equipment should be lined with or made of materials that will not be softened by contact with askarel fluid. (Silicone or Teflon-lined, or flexible metal materials are suitable.)

Table VIII	
GUIDE TO RATE OF DISSOLVED WATER REMOVAL BY FILTERING ASKAREL THROUGH A PAPER PRESS	
Passes Through Paper Press	Water in Askarel PPM
0	115
1	35
2	22
3	18
4	12
5	10
6	10



- A. Drain out all dark, carbon-contaminated askarel. (Discard by dumping or burying where it will not contaminate a water supply.)
 - B. Carefully brush carbon deposits from internal parts and insulation, using a soft bristle brush making sure that insulation is not damaged.
 - C. Flush thoroughly using new askarel (*not* an oil, *not* a cleaning solvent).
 - D. Flush a second time with fresh askarel; drain; then fill to the proper level with new askarel.
 - E. Energize transformer to warm the fluid for 24 to 48 hours; then circulate the askarel through a filter, returning it to the unit filtered and ready for use.
- * This assumes that the cause of arcing has been established and corrections made. When severe arcing occurs, major repairs are usually necessary and the unit rebuilt. This procedure can be applied for flushing out repaired units.

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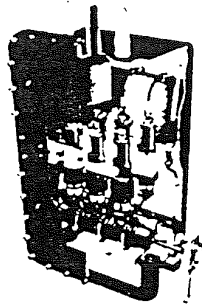


SECTION B

ASKAREL FILLED SWITCHES AND TERMINAL CHAMBERS

I. INTRODUCTION:

High voltage leads are usually connected to askarel or mineral oil-filled network transformers and power centers through terminal chambers and switches. In some cases terminal chambers are not used, and the high voltage leads are connected directly to the switch terminals. They may be filled with either askarel or mineral oil. Switches are usually rotary or drum type fitted with a revolving block and porcelain unit as the principal element arranged for three-phase service. (A cutaway view of a typical terminal chamber-switch combination is shown for reference.)



Askarel transformers with attached switches have been in use for about 30 years. When they were first introduced, the availability of insulating and gasketing materials was rather limited and even the best materials at the time had no service history. As a result, inadequate gasketing materials such as cork, nitrile rubber, and nitrile rubber-and-cork particles were used. While satisfactory for a limited period of time, these materials cannot be depended on for the expected long life of the equipment.

The terminal chamber is usually above or below the switch compartment and separated by a steel wall through which the bushings are inserted. When bushings are properly selected and correctly installed, there is no leakage from one compartment to the other. With poor bushing seals, and the terminal chamber above the switch, potting compounds or cable oil can seep into the askarel. When the terminal chamber is below the switch, askarel can drain into the terminal chamber.

II. SOURCES OF CONTAMINATION

There are three possible sources of contamination for askarel in switches and terminal chambers; they rank in this order of frequency: (1) water entering through poor gaskets; (2) decomposition products from arcing when switch is used to break magnetizing current; (3) entrance of pothead or cable compounds through leaky bushing seals.

Unlike an askarel transformer where the amount of contaminant is likely to be very small (probably only trace amounts) in relation to the volume of askarel fluid — in switches or terminal chambers with faulty seals, the amount of contamination can be relatively large.

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1. On newly installed switches, check the askarel at 3, 6 and 12 month intervals; if found satisfactory, check once annually thereafter. With proper attention to the gasketing of covers and bushings, experience will probably indicate that less frequent inspection is warranted.
2. Check askarel for:
 - a. Dielectric strength (ASTM D877): It should be 26 KV minimum. If dielectric strength is low, confirm presence of water by Karl Fischer method ASTM D-1533. Filter to remove moisture. Dielectric strength should then be 30 KV minimum.
 - b. Presence of carbon from arcing: Fluid should be relatively free of carbon. If badly arced and very black, replace fluid. If only minute amounts of carbon are present, filtration is recommended. Check power factor of liquid (should not be over 5% at 25°C. and 60 cycles). Flush out switch chamber with several gallons of fresh askarel before refilling.
3. If there is discoloration, high power factor, detectable change in specific gravity or refractive index, or if fluid flashes below 250°F., there is a possibility of seepage of potting compound into the switch compartment. In this case, correct any leaky bushing seals with proper replacements and fill with new askarel.
4. If terminal chamber is below switch, check potting compound for presence of askarel (can usually be detected by odor or by an increase in specific gravity). If askarel is present, correct any leaky bushing seals with proper replacements, and renew compounds.
5. Examine cover gaskets visually. Deterioration can be detected by swelling and cracking of the exposed edge. In cases of severe deterioration, liquid seepage is usually present.
6. Check for leakage at packing gland of switching shaft. If leaking, repack with a Silastic ring type gasket.



b) Earth Refinement Response:

Consists of treatment for 2.5 hours at 50-60°C. with 0.1 to 0.2 percent by weight of properly conditioned Attapulgus clay and then filtration through dry filter paper.

c) Analysis After Laboratory Earth Refinement:

Properties Tested

Refractive Index

Water

Free Chlorides

Acidity

Dielectric Strength

Power Factor, Dielectric Constant, and Resistivity

You will be notified of the results of this test series on your sample. Then after refining your entire transformer fluid fill you can check on the results by requesting the following analysis:

Analysis 3)

ANALYSIS AFTER EARTH REFINEMENT

Total Charge: \$30.00 (This charge will not apply when analyses 1 and 2 have already been made.)

To determine whether the entire lot of the askarel fill responded to the same extent as the laboratory sample. (five-pint sample required)

Properties Tested

Color and Condition

Refractive Index

Water

Free Chlorides

Acidity

Dielectric Strength

Power Factor, Dielectric Constant, and Resistivity

To arrange for the tests described above write to the following address:

Paul G. Benignus
Monsanto Chemical Company
800 North Lindbergh Blvd.
St. Louis 66, Missouri

Samples to be tested should be clearly marked for identification and sent directly to:

Monsanto Chemical Company
W. G. Krummrich Laboratory
Monsanto, Illinois
Attention: R. Kuster

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APPENDIX C

APPROXIMATE VAPOR PRESSURE vs. TEMPERATURE FOR TRANSFORMER ASKAREL

<u>Temperature °C</u>	<u>Inerteen PPO, 7336-9</u>	<u>Transformer Pyranol A13B3B</u>
40	1 mm Hg.	0.9 mm Hg.
60	5	3.5
80	9	8.3
100	30	18
120	60	32
140	90	53

APPENDIX D

EFFECT OF TEMPERATURE ON DIELECTRIC STRENGTH OF ASKAREL

<u>Temperature °C.</u>	<u>Dielectric Strength</u>
-60	67 KV
-40	63
-20	57
0	55
20	50
40	50
60	48
80	45

APPENDIX E

COMPARISON OF THE APPROXIMATE VISCOSITY IN SAYBOLT UNIVERSAL SECONDS OF TRANSFORMER ASKARELS AND MINERAL OIL

<u>Temp. °C.</u>	<u>Transformer Pyranol A13B3B</u>	<u>10-C Mineral Oil</u>	<u>Inerteen PPO, 7336-9</u>
-20	1,000	1,000	2,800
0	100	150	195
20	70	85	85
40	45	49	50
60	39	40	40
80	34	34	36
100	30	30	33

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APPENDIX K

Seals, Properties and Procurement

Dow Corning Corporation, Midland, Michigan with District's at Atlanta, Boston, Chicago, Cleveland, Dallas, Los Angeles, New York City, Washington, D. C. and Toronto has available Bulletin 09-019, August 1962 entitled "Silastic Design Data". This lists the gasket fabricators throughout the country from whom the "Silastic 50" gasketing can be purchased in sheet, extrusions or molded shapes.

Generally Silastic 50 sheet goods are stocked by local die cutters, hence, could be generally purchased locally. Usually, small quantities of gaskets are die cut. If larger quantities are needed, tools are made of the same type used to cut other elastomers.

Where the gasket is extruded for fitting into a machined groove or between gasket stops, Dow-Corning advises use of a scarved joint. This joint is then cemented using Dow Corning's Silastic 140 (clear) or their RTV 731 (white) materials, which air cure.

Dow Corning points out that the local "rubber" fabricators purchase the Silastic 50 in billet form. This is worked on a roll mill in preparation for sheeting or extrusion. Then to obtain the desired physical properties the fabricator must oven cure the Silastic 50 for 24 hours at 480°F.

SPECIFICATIONS*

	Color.....	White
	Specific Gravity at 77°F.	1.20 ± 0.02
ASTM D676 —	Hardness, Shore A. Scale.....	45 to 60
ASTM D412 —	Tensile Strength, psi. min.....	800
ASTM D412 —	Elongation, percent, min.....	250
ASTM D395 —	Compression Set after 22 hours at 300°F., percent, max.....	30

- * All physical properties measured on 0.075 inch thick samples molded 5 minutes at 240°F., and oven cured 24 hours at 480°F.

General Electric Company, Redmond Circle, Rome, Ga., uses silicone or DuPont's Viton wherever it is not possible or desirable to weld. For some small seals, where good matching surfaces are provided, Flexitallic stainless steel rings are used.

By contacting the Engineering Services Department of General Electric Company, Redmond Circle, Rome, Ga., users of Pyranol transformers made prior to development of these modern seals will obtain prompt assistance for conversion.

Users of askarel transformers made by other manufacturers should contact the original transformer manufacturer, or Monsanto for assistance in converting to these modern seals.

HOL 000301



MONSANTO
FUNCTIONAL FLUIDS DEPT.

800 N. LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63166

The information herein regarding obtaining optimum results from askarel fluids in your transformer has been accumulated by Monsanto for over 30 years from the experience of makers and users of askarel transformers and it is believed will be helpful.

Nothing herein shall be construed as applying to other than askarel insulation. Data and maintenance suggestions herein do not apply to the other components of the transformer. All operating and maintenance suggestions recommended by the manufacturer of the transformer should also be carefully followed.

Because these maintenance directions apply only to the askarel insulation, Monsanto disclaims any liability for damage to property or injury to persons arising from transformer operation.

HOL 000303

Discovery Ex. No. 19
Cause No. C-91-78
Roger Holland v. Monsan
6-27-91 SB



Monsanto ASKAREL

**Inspection and
Maintenance Guide**

HOL 000239

HOLLAN

7202-002093



ASKAREL

Inspection and
Maintenance Guide

HOL 000240

HOLLAN

7202-002094

WATER_PCB-SD0000059737

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SECTION A

TRANSFORMER ASKAREL

I. INTRODUCTION:

This manual describes the operating characteristics of transformer *askarel liquid* insulation and how it differs from mineral oil.

The information given is based on facts gathered by Monsanto over 30 years as producer of askarel, plus knowledge gained from the experience of transformer manufacturers and users. This guide is provided to outline the very simple maintenance required for askarel fluid in "modern" transformers and to offer suggestions for the sealing and maintaining of askarel in old units. By following this guide, users will obtain maximum service from askarel insulation with a reasonable minimum of maintenance. If questions arise relating to the designing and building of transformers — these should be referred to regular transformer suppliers.

Monsanto gratefully acknowledges the assistance, guidance, and the contributions of certain data by the following:

Frank M. Clark.....	General Electric
Edward L. Raab.....	General Electric
James G. Ford.....	Westinghouse Electric
George Shombert, Jr.....	Allis Chalmers

II. HISTORY OF TRADE NAME TYPES

"Askarel" is the generic name for non-combustible (fire-resistant) liquid insulation. In this respect, the insulation is completely different from ordinary transformer mineral oils. Transformer askarel is marketed by Monsanto. Whatever the trade-marked brand, the askarel contains Monsanto's Aroclor (chlorobiphenyl) . . . one of the best liquid insulations developed by science. This inert compound is chemically stable, fire-resistant, heat stable, non-corrosive, and has high dielectric strength under the operating conditions encountered in transformers.



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The composition changes made in transformer askarel formulations are shown in Table I.

Table I THE COMPOSITION OF TRANSFORMER ASKARELS						
	Pyranol				Inerteen	Inerteen PPO (7336-9)
	1488	1467	1470	A13B3B		
Year Introduced	1932	1944	1952	1963	1936	1945
Ingredients:						
Aroclor 1260	60	60	45	45	60	60
Trichlorobenzene	40	40	40	40	40	40
Tetrachlorobenzene			15	15		
Tin tetraphenyl		0.125	0.125			
Phenoxy propene oxide						0.20
Diepoxide				0.125		

OTHER BRAND NAMES

Various electrical equipment manufacturers use other trade-marked names for askarel liquid insulation, such as Chlorextol (Allis-Chalmers); Noflamol (Wagner Electric); Saf-T-Kuhl (Kuhlman Electric). These askarel insulating liquids are one or the other of the two standard formulations. Still other manufacturers, who designate their insulation only by its generic name, askarel, assign it a number or code. By this number, Monsanto knows whether to furnish Pyranol A13B3B or Inerteen PPO (7336-9) type formulation to the user.

III. OFFICIAL TRANSFORMER ASKAREL SHIPPING SPECIFICATIONS

The official shipping specifications for the two modern transformer askarel formulations are shown in Table II.



Table II
OFFICIAL TRANSFORMER ASKAREL SHIPPING SPECIFICATIONS

Typical Properties	General Electric Co.		Westinghouse	
	Transformer Pyranol A13B3B		Transformer Inerteen PPO (7336-9)	
Color, APHA	150 max.		150 max.	
Condition	Clear		Clear	
Water content, ppm (ASTM D1533-(C))	30 max.		30 max.	
Acidity, mg. KOH/g. (ASTM D974-55)	0.014 max.		0.014 max.	
Dielectric Strength, 25°C., 0.1 inch gap (ASTM D877-49)	35 KV, min.		35 KV, min.	
Dielectric Constant, 100°C., 1 KC (ASTM D924-49)	3.8 to 4.3		3.7 to 4.0	
Volume Resistivity, 100°C., 500 volts DC 0.1 inch gap, 10 ⁹ ohm-cm.	100		100	
Inorganic chlorides, ppm. (ASTM D1821 and G.E. Method E4C41B)	0.10 max.		0.10 max.	
Refractive index, 25°C. (ASTM D901-56)	1.6075 to 1.6085		1.6137 to 1.6147	
Viscosity at 37.8°C. (ASTM D88-56) Saybolt Universal Seconds	41 to 45		54 ± 2	
Pour point °C. (ASTM D-97-57)	—44 or lower		—32 or lower	
Specific gravity 15.5/15.5°C. (ASTM D287)	1.560 to 1.571		1.560 to 1.568	
Burn point (ASTM D92)	None to boiling		None to boiling	
Distillation range (ASTM D20-56) corrected for stem and barometric pressure	1st drop 210°C. min. 35% 55% 65% 95% 60.5 ± 5%	240 to 256 290 to 330 385 to 400 395 to 415	1st drop 200°C. min. 40% 90% 59.1% min.	below 270°C. 395 to 415°C.
Fixed chlorine				
Corrosion test				
Color, APHA				
Acidity, mg. KOH/g.				
Inorganic chlorides ppm.				
Condition				
Scavenger content				
Arc formed gases				
Coefficient of Thermal Expansion (ASTM D1903), CC./CC./°C.				

The above two formulas are used in modern transformers. There are a number of units in service dating back to 1933 with askarels of somewhat different compositions. These will be compatible with the above modern formulations.

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IV. INTERCHANGEABILITY AND STABILITY

A. Interchangeability:

The two general types of askarel insulation shown in Table II can be either mixed or interchanged and there will be no difference in the operation of the transformer. However, askarel insulation *must never be mixed* with mineral oil.

Over 2% mineral oil in askarel begins to lower its fire resistance. Further, materials of construction in the transformer that are compatible with askarel may not be compatible with oil and vice-versa. For example: a significant amount of askarel in a transformer built for mineral oil will attack gaskets, adhesives, core bindings, impregnating varnishes, etc.

B. Stability:

Askarel liquid insulation is highly pure, fire-proof liquid made under close chemical control. It does not vary in composition like the commercial range of mineral oils.

Askarel does not deteriorate when exposed to air, heat, hot metal; it does not break down over long use to form conducting or corrosive chemicals; it does not oxidize or sludge. Askarel will remain perfectly stable year after year unless broken down by exposure to severe arcing.

The only real "enemy" of askarel is *contamination by water*. Keeping askarel water-free will insure long-time service.

Askarel is heavier than water. If water gets into askarel insulation, only a tiny amount (125 ppm) dissolves — the rest floats on top.

V. DIRECTIONS FOR HANDLING

A. Keep Dry:

In handling, storing, sampling, inspecting askarel — and in operating askarel transformers — take every precaution to guard the askarel insulation from exposure to high humidity and moisture contamination. Keep 5, 30, or 55 gallon drums of askarel dry; lay stored drums on their sides with the bung at the highest point from floor to keep water off the drum head (which can be sucked into the askarel by the drum "breathing"). This precaution is not necessary when drums are stored indoors, which is the preferred way of storing.

B. Use Ordinary Personal Precautions:

Transformer askarel has been made, handled, and used for over 30 years without causing toxic or other ill effects. It can be handled with only minor precautions. If accidentally spilled on hands, no serious skin irritation will occur. However, liquid askarel has a solvent action (similar to paint thinner) on the fats and oils of the skin and prolonged contact may lead to drying and chapping of the skin.

In case of contact, wash off the skin with soap and water; remove and dry clean saturated clothing. Clean up spills with rags, sawdust or absorbent clay. Eye contact may result in painful irritation but no permanent damage to tissues. If askarel gets in the eyes, flush with large amounts of water. As with all eye first-aid, refer to a physician. To relieve irritation, physicians have used a 1% Pontocaine as well as ophthalmic cortisone acetate solution, or castor oil.

Infrequent exposure to askarel vapors will not cause ill effects. However, prolonged exposure to high vapor concentrations should be avoided. If hot askarel must be handled in a closed or confined area, provide the area with ordinary exhaust ventilation — or — wear an organic cartridge respirator approved by the U. S. Bureau of Mines.

VI. EXPECTED SERVICE LIFE

Properly designed and installed askarel transformers will give trouble-free service for a minimum of 30 years. Since their introduction in 1932, the manufacturers report finding the over-all failure rate to be less than 0.5% for all units under test and service conditions. The Edison Electric Institute's report (1956-1958) on their member utilities publishes the failure rate for askarel transformers as 0.13 per hundred banks per year. Even the rare reports of failure are invariably found to be due to improper sealing that allows moisture to enter.

VII. DIELECTRIC STRENGTH — MOISTURE RELATIONSHIP

The dielectric strength of askarel is highly sensitive to excess moisture; not sensitive to ordinary dissolved contaminants. While the dielectric strength can also be lowered by severe arcing, askarel turns noticeably black or has particles of sooty carbon floating in it if arcing has occurred. Then the transformer should be repaired and the askarel replaced.

New askarel has a minimum dielectric strength of 35 KV at 25°; a maximum moisture content of 30 ppm. If the dielectric strength is checked periodically and decreases significantly — this indicates moisture pick-up, arcing, or both. When the dielectric strength has dropped to 26 KV or less, an analysis for water is necessary. If water is found in excess of 100 ppm at 25° C., its source should be located and corrections made.

When the moisture content approaches 125 ppm (saturation level), the dielectric strength of askarel drops below the value required for efficient insulating. The moisture content should not be allowed to rise over 70 ppm; it should be held as near as possible to 30 ppm. Maintaining a low moisture level will assure high dielectric strength and top operating efficiency.

Table III shows the relationship of dielectric strength vs. moisture and Table IV indicates the approximate water solubility limits in askarel and mineral oil.



Table III
RELATION OF "BREAKDOWN STRENGTH" TO AMOUNT
OF DISSOLVED WATER IN ASKAREL AND MINERAL OIL

Water Content (PPM)	Breakdown Voltage (ASTM)	
	Askarel	Mineral Oil
0	70 KV	50 KV
20	55	39
40	47	30
60	40	26
80	38	22
110	10	5

Table IV
APPROXIMATE SOLUBILITY OF WATER IN TRANSFORMER
ASKAREL AND MINERAL OIL

°C.	Temperature	°F.	Amount of Water (PPM) Dissolved	
			Askarel	Mineral Oil
-30		-22	8	8
-20		-4	16	10
-10		14	28	13
0		32	41	20
10		50	65	33
20		68	94	58
30		86	128	85
40		104	170	130

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... may be the visual sign of undissolved water, or may indicate contamination from core materials, dirt, or deteriorating construction materials. Cloudiness may also result from cold precipitation of tin tetraphenyl "scavenger" that was used in the earlier Pyranols. This scavenger begins to come out of solution around 15°F. above zero. To redissolve it requires heating to 150 - 200°F. and agitation.

High dielectric strength will quickly indicate that any turbidity present is not moisture; that the insulating efficiency of the askarel is still excellent. However, if the dielectric strength is below 26 KV, moisture should be determined, using the Karl Fischer method (ASTM D1533-60).

The dielectric strength test for askarel serves primarily as an indicator for moisture. It is by far the most important maintenance test for transformer askarel.

VIII. TYPICAL VALUES FOUND IN ASKAREL FLUID UNDER VARIOUS USE CONDITIONS

Table V gives the entire spectrum of properties that are typical for freshly-made transformer askarel as it goes through the various normal and abnormal conditions of use.

The data in Table V are in terms of *only* the askarel *fluid* and do not refer to insulation resistance or power factor measurements on the over-all transformer insulation.

Several utilities studying the power factor values of the over-all transformer insulation system indicate that the unit power factor of a new askarel transformer should range from 1% to not over 5%. This would generally correspond with the askarel *fluid* properties as given under heading "B".



Table V

TYPICAL VALUES FOUND IN ASKAREL FLUID UNDER VARIOUS CONDITIONS OF USE

		A	-B	C	D	E	F
New askarel			Askarel in prop- erly* built new or rebuilt units prior to use.	After normal oper- ation; a survey of 50 units, most 2-5 yrs. old; some 10.	Non-arced but slightly contami- nated askarel in improperly* built units, new or slightly used.	Same askarel as in Column D — after refining.	Heavily arced askarel due to neglect and internal electrical malfunction.
Inspection Check Points							
Color	Light straw	Light straw	Light straw	Light straw	Can have foreign shades, blue, green, red cast.	Foreign shades remain showing extraction of oil soluble color.	Black
Clarity	Clear, free from particles	Clear, practically free from particles	Clear, trace of particles	Clear, slight amount of particles	Clear, free from particles		Contains carbon particles
Moisture 25°C.	30 ppm	30 ppm	10-70 ppm all dissolved water	20-100 ppm all dissolved water	30 ppm		Near 125ppm saturation level — plus possible undissolved water
Dielectric Strength 25°C., 0.1" gap	35 KV minimum	35-48 KV	35-45 KV	30-42 KV	40-45 KV		5-15 KV
Volume Resistivity 100°C., 500 Volts, DC., 0.1" gap	100 x 10 ⁹ ohm-cm. minimum usually 500-1,500	40 x 10 ⁹ ohm-cm. minimum usually at least 100 x 10 ⁹	15-400 x 10 ⁹ ohm-cm.	about 5 x 10 ⁹ ohm-cm.	at least 1,500 x 10 ⁹ ohm-cm.		about 3 x 10 ⁹ ohm-cm.
Power Factor: 100°C. 60 cycles 25°C. 60 cycles	2-5% 0.05-0.1%;	10-25% 0.5-2%;	10 to near 80% 0.5 to near 10%;	30 to 100% about 7 to over 15%;	2-5% 0.1-0.2%;		100% at least 25%

*A properly built transformer is defined as one in which the materials of construction are chemically and electrically compatible with askarel.

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Starting ideally with situation "B", it is normal to expect the power factor of the fluid in a satisfactorily operating askarel transformer to increase as shown under heading "C". The "over-all" power factor of the transformer in normal service is expected to rise, but preferably not much beyond 5%. In this normal situation, the moisture level of the askarel fluid and its dielectric strength will be satisfactory, as shown in heading "C".

Occasionally the power factor of a non-arc'd, satisfactorily-operating askarel transformer is found to be relatively high, i.e., 15%. In this case, the power factor of the askarel fluid will also be high, perhaps as high as 50% at 20°C. and 60 cycles.

It is not good practice merely to note that high power factor of the askarel fluid is to be expected. The important step is to check dielectric strength and note whether there has been a downward trend. A downward trend in dielectric strength very likely indicates moisture entrance and should be confirmed by a Karl Fischer test for water.

The importance of any abnormalities in dielectric strength and moisture content of the askarel fluid cannot be overemphasized! Where abnormal values for the dielectric strength or moisture content occur, the power factor of the transformer can be expected to be abnormally high; the expected high power factor of the askarel fluid will induce this.

The indication that a high power factor on the transformer and on the fluid is due to contamination can be verified by earth refining the askarel fluid and noting whether after refining the test results correspond with heading "E".

Assuming no mechanical defect or arcing, if the power factor of a new askarel transformer is relatively high, the power factor of the fluid will also be high, giving the situation under heading "D". This reflects contamination that should have been removed by the manufacturer of the transformer.

In absence of mechanical defect, where there are no abnormal losses in dielectric strength, and no moisture pick-up in non-arc'd askarel — the use history shows that a relatively high power factor for the askarel fluid (as compared with mineral oil) is to be expected. Normally, high power factor is due to contamination and not deterioration of the askarel operation.

As shown by F. M. Clark in his book, "Insulating Materials For Design and Engineering Practice," John Wiley & Sons, N. Y., 1962 — activated alumina can be used in the circulating system to bring the power factor down and keep it as low as possible.



IX. CHECK POINTS FOR MAINTAINING ASKAREL INSULATION

A. General Considerations:

Modern askarel transformers with welded construction or silicone gaskets for hand hole-cover, switch and terminal compartment covers, with properly constructed bushings require little or no maintenance. With properly constructed transformers, annual or semi-annual visual inspection and dielectric strength test of the askarel fluid should suffice for routine maintenance checking over many years of service.

However, many askarel units were installed in the early 1930's — before the development of some of the better modern gasketing materials and before improved designs were developed for sealing out moisture. Such early units should be, and can be, modernized. Leaky or deteriorated gaskets should be replaced. If the askarel has become contaminated, it should be reconditioned. At the same time, a general clean-up of the unit and possible refinishing may be desirable.

If it is not convenient to take an old transformer out of service for general repairs, leaky gaskets can be sealed temporarily by painting over the leaky area with epoxy cement.

A survey of users indicates a good number of early-built askarel transformers (over 20 years old) are kept in continuous service in critical installations by the following steps (instead of modernization).

The operating units are equipped with compound pressure gauges for reading pressure above and below atmospheric. Positive pressure is maintained on the shell by introducing nitrogen at 2 to 3 pounds above atmospheric. Regular workmen in the area daily record the temperature and pressure. If a sudden pressure drop is noted more nitrogen is introduced and the gaskets are checked for leaks with soap solution. Leaks are sealed by applying epoxy cement.

B. Modern Sealing Procedures:

Transformer purchasers should specify the following modern techniques for sealing:

1. **Welding Construction:** Covers, radiator connections, switch and terminal housings, instrument connections, etc. should be welded.
2. **Bushing Connections:** The most satisfactory bushings are the type with rolled-on flanges and two ring seals rolled into a depression in the porcelain — sealed with silicone rubber rings held under compression. Metal-to-glass or metal-to-porcelain sealed bushings are also satisfactory.

If for any reason the above type bushings cannot be used then use a porcelain or glass bushing with a silicone or Viton gasket retained in a groove. The gasket can be either rectangular or circular cross section, usually $\frac{1}{4}$ inch thick.

3. **Small Size Connections:** When not possible to weld, small size connection seals should be made with Flexitallic stainless steel rings. The surfaces must be machined and parallel. The filler between the steel laminations of the Flexitallic ring should be either silicone or Viton.



4. **Gaskets For Hand-Hole Covers:** Modern design specifies silicone gaskets. Such gaskets must be retained in a groove. The groove preferably is machined into the flange or cover. However, it can also be formed by welding concentric steel strips to the flange or the cover.

Generally the gaskets should be $\frac{5}{16}$ to $\frac{1}{2}$ inch thick for covers, depending on the depth of the groove. A rectangular section is usually used.

The silicone material should be Dow-Corning No. 50 Silastic or equivalent. This is a low compression set material. For best sealing 20 to 25% compression is recommended, with ample clearance in the groove to allow for this compression.

No cement is required. With reasonable care the gasket is removable without damage and is reusable.

Silastic 50 is slightly swelled by askarel which contributes to the tightness of the seal. It is not deteriorated by askarel fluid or vapors. It resists weathering and it is thermally stable and flexible at all operating temperatures. It is an excellent moisture barrier.

- Notes: a. Dow-Corning, Midland, Michigan will supply a list of Silastic 50 gasket fabricators to all transformer manufacturers or users. They will also furnish technical data.
- b. Any user of Pyranol transformers, made by General Electric Company at Rome, Ga., will receive prompt and generous help for converting to the modern silicone or Viton gaskets by contacting the General Electric Company's Service Engineering Department at Rome, Ga.

See Appendix K: Seals, Properties and Procurements.

C. The Older Sealing Arrangements:

The older type gaskets consist of either cork or cork-nitrile rubber combinations or straight nitrile rubber.

1. **Cork-Nitrile Combinations:** Covers for the main tank, hand-holes, switch and terminal chambers, relief diaphragms etc. are held in place by studs welded to the flange or by bolts. The gaskets are cut with openings and placed over the bolts. Often Shellac (Westinghouse Style No. 1150419, or General Electric Company's Glyptal 1276) is used to cement the cork to the flanges.

The following is recommended for sealing with the cork — nitrile rubber combination:

Use Armstrong NC-757 cork-nitrile material or equivalent. The gasket can be cut from a single sheet or by scarfing strips of the material. A convenient method for joining strips is to make a Keystone Type joint. For this, Westinghouse, Sharon, Pa., offers their gasket cutter Style No. 328 B614 G01, (about \$15).

- The joints should be cemented and the gasket also cemented to the flange, using one of the above cements. Excess cement should not be allowed to reach the interior of the transformer.

After installation and bolting, the outside edge of the gasket should be coated thoroughly with epoxy cement to increase weather resistance.

This epoxy cement is a paste to which a curing catalyst is added immediately before use. Typical are:

- a. Epoxy Patch Kit #1-C
Hysol Corporation, Olean, N. Y.
 - b. Scotchcast Resin #4
Minnesota Mining and Manufacturing Co.
St. Paul, Minnesota
 - c. Adhesive A-1 and Activator Type B
Armstrong Products Company
Argonne Rd., Warsaw, Ind.
 - d. Adhesive 9860-1, Synthetics Organic Company, Cleveland, Ohio, used with activator diethylene triamine (Carbide and Carbon Chem. Co.)
2. **Straight Nitrile Rubber:** When straight nitrile rubber was originally used, invariably the gasket was recessed in a groove. This was to prevent gasket flow and to protect the material against excessive compression. Although this type seal was not cemented, the nitrile rubber gasket is not reuseable.
- Since grooves or stops have already been provided for the nitrile rubber seal, Silastic 50 can be easily substituted and is recommended. This conforms with modern practice.

X. PERIODIC FLUID INSPECTION AND WHAT CHECKPOINTS MEAN

On a regular schedule — at six, nine, or twelve month intervals — make a simple visual inspection of your askarel insulation and run a dielectric strength check.

A. Visual Inspection:

Askarel is a clear, faint-yellow liquid. After long-term use this color may gradually intensify to light brown. The fluid should remain clear and free from turbidity or cloudiness.

Any color change — such as to a green, red or blue cast — indicates extraction of impurities from the solid insulation. If a distinct foreign color pick-up is noted, check the complete range of electrical characteristics and notify the transformer maker. The electrical characteristics may be found to be unimpaired. Color change alone (except for black) is not a danger signal since the contamination is not likely to impair the dielectric strength.

B. Dielectric Strength:

If the dielectric strength has decreased significantly from the last inspection, or if it has gradually decreased below 26 KV range (at 25°C.) — RUN A CHECK FOR MOISTURE. Use ASTM D901, D877 (Karl Fischer Method).

The dielectric strength of askarel is the major indicator to the operating efficiency of your liquid insulation and of the askarel transformer itself. Besides the "visual" inspection tests, dielectric strength is the only test necessary to run on a routine basis. Well-sealed askarel transformers have service records of 25 to 30 years on the original askarel. New askarel has a minimum dielectric strength of 35 KV at 35°C., a maximum moisture content of 30 ppm.

XI. INSPECTION CHECK LIST

1. If askarel is clear, even though darkened to light brown; has no sediment or turbidity; has dielectric strength over 26 KV . . . give it the inspection "OK".
2. If askarel is clear; has foreign color of blue, green, red . . . it is "extracting color" from internal materials. This is not, of itself, an operating hazard when the dielectric strength stays over 26 KV and moisture remains low. However, this rare occurrence calls for checking into condition of the interior construction and consulting the transformer maker.
3. If askarel is clear; but dielectric strength drops to 22 or lower KV, and moisture rises over 80 ppm . . . the askarel is ready for simple "refining". If the moisture is near the saturation level (about 125 ppm), a thorough inspection should be made for water droplets in the transformer tank, and even for "globules" or water floating on the askarel surface. If found, the transformer manufacturer should be consulted for reconditioning both the transformer and the fluid.
4. If askarel is dark brown to black; if black particles of carbon are seen; and dielectric strength is low . . . the askarel has been broken down by arcing. It cannot be refined and should be discarded.

If any of these four simple inspection tests appear out of the ordinary, or the relationship between appearance and test values is abnormal — contact your transformer supplier for a complete analysis.

Whenever a sample is to be shipped to Monsanto, please follow the directions shown under: "SAMPLING ASKAREL".

XII. CONTAMINATION IN TRANSFORMERS

Unlike mineral oil which can oxidize, sludge and deteriorate — askarel breaks down in transformer use *only when strongly arced*.

Thus, while askarel does not decompose in normal use — it can be contaminated more readily than the relatively non-polar mineral oil.

For example the following Table VI shows how a small amount of synthetic rubber or a bit of varnished cloth markedly increases the power factor of the askarel. Please note, however, that *such minor contamination has no adverse effect on the dielectric strength*. As explained, moisture entrance through faulty seals seems the only contaminant in normal use that lowers the dielectric strength of transformer askarel.

Table VI
EFFECT OF COMMON INSULATION MATERIALS ON POWER
FACTOR AND DIELECTRIC STRENGTH
(HEAT AGED 96 HOURS IN ASKAREL AT 100°C.)

<u>Material Immersed</u>	<u>Askarel After Exposure</u>	
	<u>Power Factor,</u> <u>Percent at 60</u> <u>cyc., 100°C.</u>	<u>Dielectric</u> <u>Strength</u> <u>25°C.</u>
None (control).....	1.0	35 KV
Black varnished cloth.....	85.0	42
Copper.....	1.5	40
Pressboard.....	2.0	37
Manila paper.....	1.5	39
Phenol formaldehyde resins.....	1.6	41
Shellac.....	6.0	36
Iron.....	5.0	39
Synthetic rubber.....	70.0	39

Similarly, trace contaminants from commonly used construction materials can lower the volume - resistivity of askarel, without affecting its dielectric strength. Table VII shows this.

Table VII
EFFECT OF COMMON INSULATION MATERIALS ON VOLUME
RESISTIVITY OF ASKAREL

<u>Sample</u>	<u>Volume Resistivity x 10⁹ ohm-cm</u> <u>(at 100°C., 500 Volts DC., 0.1" gap)</u>
1. New askarel before heat aging.....	2,000
2. New askarel after heat aging 96 hours at 100°C.....	1,900
3. After heat aging with 1 sq. inch specimens of:	
a. Phenolic resin tap changer material.....	1,200
b. Paper.....	750
c. Grade A press board (tan).....	500
d. Grade A press board (gray).....	500
e. Grade A press board, laminated strip.....	400
f. Cotton wrapping.....	300
g. Glyptal 1276 cement, cured 48 hrs. at 110°C.....	100

While trace contamination easily lowers volume resistivity from high levels, it is important as previously noted in Table V Case F, that heavy contamination (as when arced) does not lower the resistivity below the order of 10⁹ ohm-cm. at 100°C.

The different behavior of askarel vs. mineral oil in these respects can be summarized as follows:

High power factor and low volume resistivity in transformer mineral oils are commonly regarded as "danger signals" that the oil has deteriorated and broken down chemically.

This is NOT TRUE of askarel liquid insulation, unless the dielectric strength is low.

XIII. REFINING ASKAREL FOR RE-USE

A. Filtering Through Dry Blotter Paper to Remove Moisture and Extraneous Particles:

Most operators prefer portable refining apparatus, such as a plate press fitted with a dolly, (available from Sparkler, Mundelein, Ill., Westinghouse Maintenance and Repair Dept., Chicago, or General Electric Co., Pittsfield, Mass.); or the earthen cartridge filter type, (available from Industrial Filter Corp., Lebanon, Ind.). Filter paper liners for the plate press are available from Carl Schleicher and Schuell Company, Keane, New Hampshire and manufacturers of filter presses listed above.

The filter paper must be dried immediately before use. For best results, spread the paper for maximum surface exposure in a hot air circulating oven and heat it for 4 to 6 hours at 110°C.

If possible do not take the transformer out of service until ready to filter the fluid. This will keep the transformer coils relatively hot and dry. Processing the fluid should start immediately after de-energizing the unit.

Circulate the askarel hot (but not over 55-60°C.) through the filter fitted with the dry paper liners.

After filtration the dielectric strength of the askarel should be 35 KV minimum.

1. **Precautions:** Filtering should not be done when the relative humidity exceeds 75%.
2. Any flexible hoses and gaskets on the refining equipment should be lined with or made of materials that will not be softened by contact with askarel fluid. (Silicone or Teflon-lined, or flexible metal materials are suitable.)

Table VIII	
GUIDE TO RATE OF DISSOLVED WATER REMOVAL BY FILTERING ASKAREL THROUGH A PAPER PRESS	
Passes Through Paper Press	Water in Askarel PPM
0	115
1	35
2	22
3	18
4	12
5	10
6	10

B. Earth Treatment for Maximum Improvement of Power Factor and Volume-Resistivity:

1. Procedure:

(The askarel liquid should be relatively dry prior to the following earth filtration.)

Use finely divided Attapulugus clay or Fuller's earth (dried and activated by heating for 12 hours at 300-350°F. immediately prior to use) as a coating on the filter paper surface. The amount of earth used should be 0.1 to 0.2 per cent by weight on the weight of the askarel to be treated. (Askarel weighs about 13 pounds per gallon).

To deposit the earth evenly, stir one-third of the earth with a small portion of askarel in a clean container. Pump the mixture through the filter and follow with two more one-third portions. Then circulate askarel taken from near the top of the transformer, pass it hot (not over 55-60°C.) through the earth coated filter and feed back through the bottom transformer outlet. Continue circulation until the fluid is clear and test shows that the electrical properties are fully restored.

2. Effect of Earth on Removal of Scavengers:

Only slight and insignificant loss (by selective absorption) of tetratraphenyl and epoxides occurs when askarel is refined by treatment with 0.1 to 0.2 per cent by weight of earth. To remove significant amounts of the scavengers requires repetitious treatment with much larger amounts of earth.

3. Table IX — Approximate Relationship Between Power Factor, Volume - Resistivity and Dielectric Strength of Transformer Askarel:

Power Factor (60 cyc.)		Volume Resistivity x 10 ⁹ ohm-cm. (at 100°C., 500 Volts DC., 0.1" gap)	Dielectric Strength 25°C., 0.1" gap
100°C.	25°C.		
2%	0.05%	1500	35 KV
5%	0.1%	500	35
15%	0.7%	100	35
20-25%	2.0%	60-70	35
40-50%	—	25	35

If it is desired (although these factors are not generally considered important for askarel transformers), to keep the power factor as low as possible and the resistivity as high as possible, hang a container of anhydrous alumina or activated clay in the circulating system of the transformer.

XIV. CLEANING ARCED TRANSFORMERS

If a unit has arced so that the askarel is no longer fit for use, a thorough cleaning of the unit is necessary before refilling with new askarel insulation and returning it to service*. Follow this procedure:

- A. Drain out all dark, carbon-contaminated askarel. (Discard by dumping or burying where it will not contaminate a water supply.)
 - B. Carefully brush carbon deposits from internal parts and insulation, using a soft bristle brush making sure that insulation is not damaged.
 - C. Flush thoroughly using new askarel (*not* an oil, *not* a cleaning solvent).
 - D. Flush a second time with fresh askarel; drain; then fill to the proper level with new askarel.
 - E. Energize transformer to warm the fluid for 24 to 48 hours; then circulate the askarel through a filter, returning it to the unit filtered and ready for use.
- * This assumes that the cause of arcing has been established and corrections made. When severe arcing occurs, major repairs are usually necessary and the unit rebuilt. This procedure can be applied for flushing out repaired units.

XV. SAMPLING ASKAREL

Take a sample as close to the top of the liquid surface as possible. (Many large askarel transformers have a built-in sampling tube near the surface for convenient sampling). Then, to make sure that your SAMPLE truly represents your askarel insulation, take another sample from the bottom. If additional sampling tube connections are contrived on the valves for easier sampling, make the tubes of clean glass, stainless steel, aluminum or tin for rigid types; and silicone or Teflon tubing for flexible types.

Use NEW containers for the askarel sample. A new and thoroughly pre-dried small-mouth quart glass bottle fitted with a Bakelite screw cap fitted with an aluminum or tin bottle cap liner is recommended for "quick on-the-site testing." (If complete analysis is to be made, a 5-pint size sample is required).

Be sure that the new bottle does not stand open to collect dust or moisture. Rinse the sample bottle and cap lining two or three times with askarel from the transformer; then fill it. If the sample will be tested promptly, a clear glass bottle can be used. If sample is to be stored indefinitely, use an amber glass bottle or wrap clear glass with aluminum foil.

- A. Select a dry day. Do not sample insulation on a warm, moist day when humidity exceeds 75%, and . . .
- B. Make sure that the askarel is at least as warm as the surrounding air. (Cold liquids can condense moisture from humid air.)
- C. When sampling askarel from transformers, it is best to take the sample when the unit is warm and operating at average or maximum load. Especially as a check on moisture (as reflected by a dielectric strength test), sampling the warm askarel more truly represents its condition during operation.

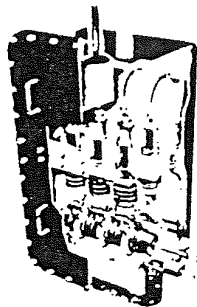
Experience shows that water will migrate from a transformer's solid insulation to the askarel liquid and vice versa, depending on temperature. Therefore, when the transformer is hot, the moisture is most likely to be found in the liquid. This accounts largely for periodic variations in dielectric strength. For example: a relatively high dielectric strength may be found during winter months and a relatively low dielectric strength during the summer months on samples taken from the same unit.

SECTION B

ASKAREL FILLED SWITCHES AND TERMINAL CHAMBERS

I. INTRODUCTION:

High voltage leads are usually connected to askarel or mineral oil-filled network transformers and power centers through terminal chambers and switches. In some cases terminal chambers are not used, and the high voltage leads are connected directly to the switch terminals. They may be filled with either askarel or mineral oil. Switches are usually rotary or drum type fitted with a revolving block and porcelain unit as the principal element arranged for three-phase service. (A cutaway view of a typical terminal chamber-switch combination is shown for reference.)



Askarel transformers with attached switches have been in use for about 30 years. When they were first introduced, the availability of insulating and gasketing materials was rather limited and even the best materials at the time had no service history. As a result, inadequate gasketing materials such as cork, nitrile rubber, and nitrile rubber-and-cork particles were used. While satisfactory for a limited period of time, these materials cannot be depended on for the expected long life of the equipment.

The terminal chamber is usually above or below the switch compartment and separated by a steel wall through which the bushings are inserted. When bushings are properly selected and correctly installed, there is no leakage from one compartment to the other. With poor bushing seals, and the terminal chamber above the switch, potting compounds or cable oil can seep into the askarel. When the terminal chamber is below the switch, askarel can drain into the terminal chamber.

II. SOURCES OF CONTAMINATION

There are three possible sources of contamination for askarel in switches and terminal chambers; they rank in this order of frequency: (1) water entering through poor gaskets; (2) decomposition products from arcing when switch is used to break magnetizing current; (3) entrance of pothead or cable compounds through leaky bushing seals.

Unlike an askarel transformer where the amount of contaminant is likely to be very small (probably only trace amounts) in relation to the volume of askarel fluid — in switches or terminal chambers with faulty seals, the amount of contamination can be relatively large.

Experience has shown that, based on the number of installed askarel-switch units, the percentage of failures is extremely small. When investigated, it has been found that most failures originate in the switch chamber. Water is the chief source of contamination. However, heavy contamination of askarel with petrolatum and asphalt material, due to leakage, have caused a few failures.

Petrolatum is used frequently for filling terminal chambers. When either cable oil or petrolatum seeps into askarel, no great harm results. The fire resistance will be somewhat decreased and power factor of the askarel will increase with an accompanying drop in resistivity. While highly undesirable, it is doubtful that failure of the unit results. Where asphaltic compounds are used in place of petrolatum, the danger is increased somewhat because asphaltic contamination may cause excessively high dielectric losses in the askarel.

When the terminal chamber is below the switch chamber, the potting compound can be contaminated by askarel if the bushing seals are leaky. This is undesirable because the askarel will increase the power factor and conductivity of the potting compound or cable oil and develop heat from dielectric loss. If this mixture is drawn into the cable insulation, a cable failure is likely. This again emphasizes the importance of tight bushing assemblies.

III. SEALING SWITCHES AND TERMINAL CHAMBERS

Proper bushing construction, use of Silastic seals and welding wherever possible is highly desirable (as covered in Section A). Where an elastomeric seal is to be used in contact with both askarel and petroleum oil, DuPont's Viton is suggested.

For new equipment the user should specify these modern sealing arrangements to keep out contaminants and minimize maintenance.

IV. MAINTENANCE FOR ASKAREL FILLED SWITCHES

- A. Switches used for grounding after power source has been de-energized will not undergo arcing.
- B. Switches interrupting magnetizing current will be subject to arcing; the amount of decomposition will depend on power interrupted, time and frequency of operation. As a general rule, the liquid should be checked after 5 to 10 operations.

1. On newly installed switches, check the askarel at 3, 6 and 12 month intervals; if found satisfactory, check once annually thereafter. With proper attention to the gasketing of covers and bushings, experience will probably indicate that less frequent inspection is warranted.
2. Check askarel for:
 - a. Dielectric strength (ASTM D877): It should be 26 KV minimum. If dielectric strength is low, confirm presence of water by Karl Fischer method ASTM D-1533. Filter to remove moisture. Dielectric strength should then be 30 KV minimum.
 - b. Presence of carbon from arcing: Fluid should be relatively free of carbon. If badly arced and very black, replace fluid. If only minute amounts of carbon are present, filtration is recommended. Check power factor of liquid (should not be over 5% at 25°C. and 60 cycles). Flush out switch chamber with several gallons of fresh askarel before refilling.
3. If there is discoloration, high power factor, detectable change in specific gravity or refractive index, or if fluid flashes below 250°F., there is a possibility of seepage of potting compound into the switch compartment. In this case, correct any leaky bushing seals with proper replacements and fill with new askarel.
4. If terminal chamber is below switch, check potting compound for presence of askarel (can usually be detected by odor or by an increase in specific gravity). If askarel is present, correct any leaky bushing seals with proper replacements, and renew compounds.
5. Examine cover gaskets visually. Deterioration can be detected by swelling and cracking of the exposed edge. In cases of severe deterioration, liquid seepage is usually present.
6. Check for leakage at packing gland of switching shaft. If leaking, repack with a Silastic ring type gasket.

SECTION C
ANALYTICAL SERVICES ON TRANSFORMER ASKAREL AVAILABLE
FROM MONSANTO

Transformer users not wishing to make their own fluid analyses can obtain the service from Monsanto. Simply contact Monsanto and specify what analyses are wanted. You will be sent the proper-sized sample container filled with fresh askarel. When you receive this, empty it and carefully take your sample (following the procedure for sampling in this guide). Send the container to Monsanto's laboratory. Charges listed include sample container, shipping, handling and laboratory costs.

Types of Analyses Available

Analysis 1)

ROUTINE MAINTENANCE CHECK

Total Charge: \$20.00

To determine the general condition of the fluid and find whether further analysis is necessary. (one-quart sample required)

Properties Tested
Color and Condition
Dielectric Strength
Moisture

You will be notified of the results of this test. If further testing is indicated, and you want a complete analysis, you will be sent a five-pint sample container. This sample will be used for the following series of tests:

Analysis 2)

COMPLETE ANALYSIS

Total Charge: \$50.00

(a) To determine the extent of fluid contamination, (b) earth refinement to determine what degree of restoration of electrical and insulating properties is possible, (c) check test to see how the fluid responded to earth treatment.

a) Complete Analysis: to determine the extent of contamination

Properties Tested
Color and Condition
Specific Gravity
Refractive Index
Water
Free Chlorides
Acidity
Dielectric Strength
Power Factor, Dielectric Constant, and Resistivity

b) Earth Refinement Response:

Consists of treatment for 2.5 hours at 50-60°C. with 0.1 to 0.2 percent by weight of properly conditioned Attapulugus clay and then filtration through dry filter paper.

c) Analysis After Laboratory Earth Refinement:

Properties Tested

Refractive Index

Water

Free Chlorides

Acidity

Dielectric Strength

Power Factor, Dielectric Constant, and Resistivity

You will be notified of the results of this test series on your sample. Then after refining your entire transformer fluid fill you can check on the results by requesting the following analysis:

Analysis 3)

ANALYSIS AFTER EARTH REFINEMENT

Total Charge: \$30.00 (This charge will not apply when analyses 1 and 2 have already been made.)

To determine whether the entire lot of the askarel fill responded to the same extent as the laboratory sample. (five-pint sample required)

Properties Tested

Color and Condition

Refractive Index

Water

Free Chlorides

Acidity

Dielectric Strength

Power Factor, Dielectric Constant, and Resistivity

To arrange for the tests described above write to the following address:

Paul G. Benignus
Monsanto Chemical Company
800 North Lindbergh Blvd.
St. Louis 66, Missouri

Samples to be tested should be clearly marked for identification and sent directly to:

Monsanto Chemical Company
W. G. Krummrich Laboratory
Monsanto, Illinois
Attention: R. Kuster

APPENDIX

APPENDIX A — Askarel Stability and Composition of Arc Formed Gas:

Askarel insulation is one of the most inert, chemically-stable heat resistant, non-corrosive liquids known. It will not break down, oxidize or sludge when exposed to air and high temperatures, 150°C. or even somewhat higher. Arcing, however, will break down the compound to liberate some hydrogen chloride and small amounts of carbon.

APPROXIMATE COMPOSITION ARC FORMED GAS FROM TRANSFORMER ASKAREL

<u>Gas</u>	<u>Amount</u>
carbon monoxide.....	0.3 per cent
carbon dioxide.....	0.3
oxygen.....	0.6
inert gases.....	1.5
hydrogen chloride.....	97.3

(note the absence of phosgene)

This arc-formed gas is non-flammable and non-combustible. These requirements must be met in accordance with the Underwriters' Laboratory for permission to use the term askarel.

Mineral oil evolves combustible hydrogen and hydrocarbon gases.

For all practical purposes, the amount of gas liberated from mineral oil or askarel under a given set of conditions is about 100 cubic centimeters per kilowatt-second.

APPENDIX B

SOLUBILITY OF GAS IN TRANSFORMER ASKAREL				
	Percent of Gas By Volume Corrected to:			
	25°C. 760 mm		0°C. 760 mm	
	25°C.	100°C.	25°C.	100°C.
Carbon dioxide.....	71 ⁶ / ₆	47 ⁶ / ₆	—	—
Air.....	5.7	4.9	5.8	5.0
Nitrogen.....	6.0	4.8	5.5	4.4
Hydrogen chloride ¹	37.8	50.9	—	—

1) In absence of scavenger

APPENDIX C

APPROXIMATE VAPOR PRESSURE vs. TEMPERATURE FOR TRANSFORMER ASKAREL

<u>Temperature °C</u>	<u>Inerteen PPO, 7336-9</u>	<u>Transformer Pyranol A13B3B</u>
40	1 mm Hg.	0.9 mm Hg.
60	5	3.5
80	9	8.3
100	30	18
120	60	32
140	90	53

APPENDIX D

EFFECT OF TEMPERATURE ON DIELECTRIC STRENGTH OF ASKAREL

<u>Temperature °C.</u>	<u>Dielectric Strength</u>
—60	67 KV
—40	63
—20	57
0	55
20	50
40	50
60	48
80	45

APPENDIX E

COMPARISON OF THE APPROXIMATE VISCOSITY IN SAYBOLT UNIVERSAL SECONDS OF TRANSFORMER ASKARELS AND MINERAL OIL

<u>Temp. °C.</u>	<u>Transformer Pyranol A13B3B</u>	<u>10-C Mineral Oil</u>	<u>Inerteen PPO, 7336-9</u>
—20	1,000	1,000	2,800
0	100	150	195
20	70	85	85
40	45	49	50
60	39	40	40
80	34	34	36
100	30	30	33

APPENDIX F

THE DENSITY OF INERTEEN PPO 7336-9 AND TRANSFORMER PYRANOL A13B3B Approx. Density gm/cc.		
<u>Temperature °C.</u>	<u>Inerteen PPO, 7336-9</u>	<u>Transformer Pyranol A13B3B</u>
0	1.574	1.577
20	1.552	1.555
40	1.529	1.532
60	1.507	1.510
80	1.485	1.488

APPENDIX G

The thermal conductivity values of transformer Pyranol A13B3B at 27°C. and 58°C. are 26.2 and 25.8×10^{-5} calories centimeters⁻¹, degrees centigrade⁻¹, second⁻¹, respectively. Or, approximately 0.06 BTU per (hr.) (sq. ft.) (°F.) per foot. This same approximation applies to Inerteen PPO (7336-9).

APPENDIX H

Heat Capacity

Over the temperature range of 25° to 125°C. the specific heat of transformer askarel is close to 0.30 calories per gram per degree.

APPENDIX I

Coefficient of Expansion

The average coefficient of expansion of transformer askarel over the temperature range 20 to 100°C. is 0.007 cc/cc /°C. One gallon would increase to 1.056 gallons on heating from 20 to 100°C.

APPENDIX J

Fire-Resistance

To use the generic name "askarel," the fluids must be approved by the Underwriters' Laboratories as possessing adequate fire-resistance and freedom from forming explosive gases when arced. These liquids do not have a burn point (ASTM D92-33) (Cleveland open cup method) up to about 205°C., at which temperatures they begin to boil. The significance of this is that they do not burn or support combustion under conditions encountered in transformer operation. Thus the danger of secondary explosion (or fire) is eliminated.

APPENDIX K

Seals, Properties and Procurement

Dow Corning Corporation, Midland, Michigan with District's at Atlanta, Boston, Chicago, Cleveland, Dallas, Los Angeles, New York City, Washington, D. C. and Toronto has available Bulletin 09-019, August 1962 entitled "Silastic Design Data". This lists the gasket fabricators throughout the country from whom the "Silastic 50" gasketing can be purchased in sheet, extrusions or molded shapes.

Generally Silastic 50 sheet goods are stocked by local die cutters, hence, could be generally purchased locally. Usually, small quantities of gaskets are die cut. If larger quantities are needed, tools are made of the same type used to cut other elastomers.

Where the gasket is extruded for fitting into a machined groove or between gasket stops, Dow-Corning advises use of a scarfed joint. This joint is then cemented using Dow Corning's Silastic 140 (clear) or their RTV 731 (white) materials, which air cure.

Dow Corning points out that the local "rubber" fabricators purchase the Silastic 50 in billet form. This is worked on a roll mill in preparation for sheeting or extrusion. Then to obtain the desired physical properties the fabricator must oven cure the Silastic 50 for 24 hours at 480°F.

SPECIFICATIONS*

	Color.....	White
	Specific Gravity at 77°F.	1.20 ± 0.02
ASTM D676 —	Hardness, Shore A. Scale.....	45 to 60
ASTM D412 —	Tensile Strength, psi. min.....	800
ASTM D412 —	Elongation, percent, min.....	250
ASTM D395 —	Compression Set after 22 hours at 300°F., percent, max.....	30

- * All physical properties measured on 0.075 inch thick samples molded 5 minutes at 240°F., and oven cured 24 hours at 480°F.

General Electric Company, Redmond Circle, Rome, Ga., uses silicone or DuPont's Viton wherever it is not possible or desirable to weld. For some small seals, where good matching surfaces are provided, Flexitallic stainless steel rings are used.

By contacting the Engineering Services Department of General Electric Company, Redmond Circle, Rome, Ga., users of Pyranol transformers made prior to development of these modern seals will obtain prompt assistance for conversion.

Users of askarel transformers made by other manufacturers should contact the original transformer manufacturer, or Monsanto for assistance in converting to these modern seals.

NOTES

HOL 000270

HOLLAN

7202-002124

WATER_PCB-SD0000059766



MONSANTO
FUNCTIONAL FLUIDS DEPT.

800 N. LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63166

The information herein regarding obtaining optimum results from askarel fluids in your transformer has been accumulated by Monsanto for over 30 years from the experience of makers and users of askarel transformers and it is believed will be helpful.

Nothing herein shall be construed as applying to other than askarel insulation. Data and maintenance suggestions herein do not apply to the other components of the transformer. All operating and maintenance suggestions recommended by the manufacturer of the transformer should also be carefully followed.

Because these maintenance directions apply only to the askarel insulation, Monsanto disclaims any liability for damage to property or injury to persons arising from transformer operation.

HOL 000271