

DATE: March 25, 1986

cc: T. M. Bistline
Cheryl Gordon
G. E. Turner

SUBJECT: PCB Litigation

MAR 26 1986

REFERENCE: Craddock Inquiry/Shell,
Goleta, California

TO

John H. Craddock G3WG
Robert G. Kaley S3C

At the request of Gail Turner, I have reviewed the documents in our database that reference Shell Oil, Molino Gas Plant, Rural Route No. 1, Box 66A, Goleta, California. This search was based on a March 4, 1986 inquiry from Dr. Bob Kaley to Gail.

Dr. Kaley received an inquiry from Shell requesting information on their Therminol FR purchases, including when Monsanto contacted them about the PCB environmental issues, what acknowledgement they may have returned, and what they may have returned for incineration. Dr. Kaley said that Shell may also have received PCBs from Looman Distributor, Incorporated, 196 West Main, Ventura, California.

A database search indicates no documents in our repository for Looman Distributors, and we do not believe we ever sold them. However, our records indicate that Shell Oil Company locations in Goleta, California and in Ventura, California purchased PCB Therminols and received warning letters from Monsanto.

For your information, our records show that Shell Chemical Company and Shell Oil Company, both located in Ventura, California, received February 9, 1970 and February 27, 1970 letters alerting them to the discovery of PCBs in the environment. These letters attached copies of the October 29, 1969 Chemical Week article that discussed water pollution. Shell Oil Company in Ventura, California also received the December 15, 1971 letter which attached the October 1970 C. G. Gustafson Environmental Science and Technology article on PCBs. This letter advised of the termination of sales of Therminol FR fluids due to the environmental problem and advised of Monsanto's Therminol conversion program. In this program, in addition to providing advice on alternative fluids and offering return shipping instructions, Monsanto paid for the return and disposal of Therminol FR fluids returned to it before March 1, 1972. I have enclosed unnumbered copies of these letters and redacted mailing lists for your information. We do not have any additional documents referencing Shell in Ventura, California, or whether or not they returned any PCBs to Monsanto for disposal.

With respect to the Shell, Molino plant in Goleta, California, our records indicate that they were sent form-type warning letters in November, 1970; in August, 1971; in December, 1971; in April, 1972; and in May, 1972. Unnumbered copies of these letters, with redacted mailing lists, are attached.

The August, 1971 letter is the earliest letter sent to Shell, Goleta referencing the PCB environmental issue.

The December, 1971 letter and attachment were described above.

The April, 1972 letter from W. B. Papageorge strongly emphasized the importance of preventing PCBs from escaping into the environment.

The May, 1972 letter advised that Monsanto would start charging for disposal of Therminol fluids returned to it for incineration.

Our records also include a copy of a direct February, 1972 letter to Mr. Nelson, of Shell Oil, Molino Gas Plant in Goleta, California. This letter discussed the conversion of Shell/Molino's Therminol FR heat transfer system and provided information on converting from Therminol FR to Therminol 55 or 66. This letter enclosed product brochures discussing Therminol conversion and replacement products. Unnumbered copies of this letter and of these brochures are attached for your information. As you will see, the (1972) Therminol Conversion brochure discusses the PCB environmental issue and provides instructions for removing Therminol FR fluids from a heat-transfer system and for returning them to Monsanto for disposal.

According to the Closing Report on the Therminol FR Conversion Project, dated December, 1982 "no action" was the status for Shell's Goleta, California location. Although the conversion log book indicates that the above mentioned warning letters were sent, there is no indication that any Therminol fluids were ever returned to Monsanto from Shell in Goleta, California.

If you have any questions or need any of the documents mentioned above and not attached, please let me know. Gail asks that you supply Shell with as few documents as possible and that you check with Tom Bistline before preparing your final response. Gail asks also that you send her a copy of your final response to Shell.

marjie

Marjorie A. Reilly

MAR:ch:LD91ch110

Enc.