Monsanto

FROM (NAME & LOCATION): C. F. Buckley - Krummrich

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SUBJECT: SUBSTITUTION OF AROCLOR

REFERENCE:

cc: G. L. Bratsch
P. E. Heisler
J. M. White
W. C. Engman
B. Papageorge

TO : B. B. Byrne
E. R. Billen
B. W. Corlew
C. N. Deubner
T. W. Dalton
J. C. Hume
D. W. Jackson
A. E. Leisy
S. B. Lutkewitte
D. C. Otto
B. R. Williams

Recently I have been asked several questions about the substitution of other therminols and pydrauls for those containing Aroclor. The answers have general interest and are listed below. Also attached is a note on the reasons for making these changes:

QUESTION 1:

If we change to Therminol 66, do we still need to curb and sump the area to prevent loss to sewer?

ANSWER:

Ideally all manufacturing processes should be so protected in order to contain spills, etc. That is, we should provide the production departments with the tools they need to limit stream pollution. However, to curb and sump all existing installations immediately is economically unfeasible. We, therefore, recommend that new installations are adequately protected in this way and that every opportunity is taken to incorporate such protection when repairs or modifications are made. However, there is no urgent need to install curbs where none presently exist unless required for other pollution control projects.

QUESTION 2:

Must waste Therminol 66 be drummed off or pumped to a waste trailer?

ANSWER:

Yes. However, it can be sent to the sanitary landfill.

QUESTION 3:

The substitute Pydraul, A200B, contains chlorinated hydrocarbons and may possibly cause environmental problems in the same way as Aroclor. Are we substituting one problem for another?

ANSWER:

This is a possibility and we should take stringent precautions to prevent loss. Deliberate draining of material to the sewer is obviously unacceptable but accidental losses are bound to occur. Our immediate need is to avoid losing material which can be identified as polychlorinated biphenyl in the WGK effluent and thereby precipitate injunctive action against us. Therefore, this substitution satisfies our immediate needs but, as yet, we have insufficient information on its behavior in the environment to be certain that no problems will ever arise from its use.

In summary, we need to constantly improve our control over all the materials that we handle while keeping expenditures within practical limits. At the same time we must reserve sufficient financial and engineering resources to be able to attack problems such as mercury and PCB effectively when they arise.

C. F. Buckley

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Attachment

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