Monsanto

PCB Memo

F. J. Holzapfel - B2NB

October 21, 1971

PCB POTENTIAL CONTAMINATION

cc: P. B. Hodges
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TO Plant Managers

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Guest Locations

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As we investigate uses of PCB's as heat transfer media or hydraulic fluids, we continue to uncover applications where foodstuffs contamination is possible. Even though probability of such contamination is highly remote, the situation on PCB's is so touchy that any such accident could be disastrous in overall consequences. We simply cannot afford to take any chances.

Therefore, will each of you please:

1.) Survey your operations for all points where contact with PCB's, or materials containing PCB's, is possible. These could include heat transfer systems, lubricants, process off-gases, hydraulic fluids, etc.

2.) Analyze each point of possible PCB contact to establish ultimate uses of intermediates or products which could possibly be contaminated, to even a slight degree.

3.) Where current production of any intermediates and products:

a.) Could have possibly become contaminated, and

b.) Can eventually be used in foodstuffs or drugs, or can eventually come into contact with foodstuffs (as in paper or plastics),

consult with Bill Papageorge on arrangements for testing such intermediates/products for PCB content.

4.) Eliminate use of the PCB's or material containing PCB's, where practicable.

5.) In situations where complete elimination of use of PCB's is not practicable, set up a system of quality checks adequate to prevent any accidentally contaminated material from reaching the market.

6.) Report back to me by November 30, 1971 on findings from your investigations and actions taken.

If you have any questions on this, please call Paul Hodges or Bill Papageorge. They will advise and assist you.

F. J. Holzapfel

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