FROM (NAME & LOCATION) B2SC Cumming Paton

DATE April 27, 1972

SUBJECT PCB Labeling and Warnings

REFERENCE

TO : B2NK
W. B. PAPAGEORGE

cc A2NA E. Greene
B2NA D. C. Jones
B2SA J. F. Stapleton
B2SC P. G. Benignus
B2SL H. S. Bergen/T. L. Gossage
B2NO W. N. Maddox
B2NK E. M. Potter

With regard to labeling and warnings, the status seems to be as follows:

A. U.S. Production	Action	Status
1. Drum Types	New strengthened drum	In use
2. T/C or T/T Labelling	Handled by G. R. Sido et al.	In use
3. Drum Labels	Handled by G. R. Sido et al.	In use
4. Notification of Carriers on B/L		
a) Bulk T/C or T/T	None	
b) Truckers	None	
c) Ocean	S. O. Morrison initiating	
5. B/L Notice-Wording	In doubt (See attachment A)	
6. Order Acknowledgments	Every order entered for domestic sale is sent copy of letter (See attachment B)	In use
7. Invoice Warning	None	

B. MCL Production (Status may be in doubt)

1. Drum Types	Yellow	Proposed
2. T/C or T/T Labelling	Handled by A. E. Meadowcraft	In use?
3. Drum Labels	Conform to Strasbourg Convention - differ from U.S.	Should be in use

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EXHIBIT
Paton-11
6-5-98 DN

U.S. Production	Action	Status
4. Notification of Carriers on B/L		
a) Bulk T/C or T/T	A.E. Meadowcroft initiating	?
b) Truckers	?	
c) Ocean	A.E. Meadowcroft initiating	?
5. B/L Notice-Wording	I do not know wording	?
6. Order Acknowledgments	See Attachment C	In process
7. Invoice Acknowledgments	See Attachment C	In process

On drums, T/C or T/T labeling and drum labels we seem in good shape. There are some differences between U.S. and U.K. practice but I believe these are unimportant since each was designed to comply with U.S. and U.K. or European regulations. I'd say let us abide by that.

Notification of Carriers is important. It seems as if bulk movements are covered with ocean freight getting attention. Can domestic/Canadian shipments and maybe even European drum shipments the answer is either no or unclear.

Currently in U.S.A. dielectric PCBs are shipped as Plastic liquids NOIBN. This means to a clerk consolidating freight that they are not considered hazardous and could be shipped with food. Adding "polychlorinated biphenyls" would add nothing to a clerk's comprehension of care to be taken. Thus we should consider adding a warning statement on the B/L. We need to work with this through Gil Kasten and Bill Maddox.

B/L Wording : I think we should co-ordinate with MESA and standardize on common wording (See Attachment A).

Order Acknowledgments : Again wording differs between current U.S./Canada and proposed International. I suggest we standardize on Attachments B and C.

Invoice Acknowledgments : We propose to use in Europe and U.S. export but do not use domestically. Since we have much stricter protection in U.S./Canada than elsewhere, the question is can we continue shipments to U.S./Canada without warning attachments and use only in Europe and MCL/MC export outside Canada. If so should we standardize on the wording in Attachment C.

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Bill, can I ask you to pull all this together. Thank you.
Please contact Paul Benignus re Product Group input.

Cumming Paton

cs
Attachments

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Attachment A

Bill of Lading Notice - Drum Shipments

1. Proposed U.S./Canada (Gil Kasten)

"This product cannot come into contact with food, animal feedstuffs or pharmaceuticals. Extreme care should be taken to prevent any entry to the environment through spills, leakage, disposal, vaporization or otherwise. When such accidents occur, the product must be collected and not allowed to enter the environment."

2. MCL - wording not known.

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Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 694-1000

ATTACHMENT B

ORDER ACKNOWLEDGMENT WORDING - U.S.

As we have previously notified you by way of correspondence since early 1970, the material described on the attached acknowledgment of your order contains polychlorinated biphenyls (PCB). Polychlorinated biphenyls are highly stable chemical compounds and are not readily biodegradable. Therefore, when placed in the environment they may be considered contaminants and may adversely affect some species of animal and marine life.

You must take every precaution to prevent any entry of polychlorinated biphenyls into the environment through spills, usage, leakage, disposal, vaporization or otherwise.

This material should not be used by you or your customer in equipment, packaging materials or products involved in the processing, handling, or storage of food, food related products, animal feeds, food wrapping or container materials, potable waters or pharmaceuticals.

Very truly yours,

Howard S. Bergen, Jr.
Director
Specialty Products Group

/jf

Attachment

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ATTACHMENT C

PROPOSED WORDING ORDER ACKNOWLEDGMENT/INVOICE

CANADA/U.S. EXPORT/MCL PRODUCTION

NOTICE -- Some studies have shown that polychlorinated biphenyls may be persistent, an environmental contaminant and possibly injurious to certain forms of bird, aquatic and animal life.

Use of this product must be restricted to applications which can be controlled so that entry into the environment does not occur and for applications in which it cannot come into contact with food, animal feedstuffs or pharmaceuticals.

Extreme care should be taken to prevent any entry to the environment through spills, leakage, disposal, vaporization or otherwise. When such accidents occur, the product must be collected and not allowed to enter the environment.

PRECAUTIONS -- HARMFUL SUBSTANCE if taken internally or if in prolonged contact with the skin CAUSES IRRITATION of skin and eyes.

Keep container properly closed.
Store away from food and drink.
Do not eat or smoke when using.
Avoid breathing vapours, mists or fumes.
Avoid contact with eyes or prolonged contact with skin.
Do not reuse contaminated clothing.
Wash product from skin with soap and water.
Wash eyes by flushing with water.

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