

COMPANY CONFIDENTIAL

PCB EMERGENCY PLAN

ACTIONS

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PCB EMERGENCY PLAN

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1. Scenario

The plan assumes an immediate ban on production, sale or use of PCB before volume production of MCS 1238 is ready. It is recognized that the actual circumstances may vary from this scenario, so provision has been made to review the plan to assure that it fits before committing publicly to the indicated policies.

Responsibility for verification of existence of a ban, initiation of this plan and verification of acceptance of responsibilities: R.G. Potter

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2. Preliminary Actions

- a. Persuade customers to accelerate MCS 1238 approval programs.
Responsibility: D. Wood (contact by 2/15/76)
- b. Confirm no continuing contractual obligations to supply.
Responsibility: D. Wood (12/31/75) (Done)
- c. Prepare survey of Askarel equipment used by Monsanto.
Responsibility: G.L. Bratsch (request to GLB by 12/22/75) (Done)
- d. List corporate sales to all dielectric customers.
Responsibility: R.E. Hatton (MICC 1/31/76, Corp. 3/31/76)
- e. Prepare Tentative P.R. statement.
Responsibility: D.R. Bishop (1/1/76) (Done)
- f. List names of contacts to call at all customers.
Responsibility: D. Wood (1/31/76)
- g. Define detailed decontamination procedure for use at Krummrich and possible adaptation for customers.
Responsibility: J.R. Savage (1/22/76)
- h. Prepare recommendation on advice to customers re decontamination.
Responsibility: D. Wood (2/15/76)
- i. Develop list of publications for potential ad campaign.
Responsibility: D.R. Bishop (12/19/75)

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3. Emergency Plan

A. Immediate Actions

<u>Timing</u>	<u>Action</u>
Day 1	1) Suspend chlorination operations. Suspend shipments from Krummrich Plant and warehouses (Santa Clara, Elizabeth, Los Angeles). Do not recall shipments enroute. Finish any distillation batches under way. Responsibility: R.A. Pohl Contacts: Krummrich Plant A.E. Leisy R.W. Flint Warehouses E.M. Potter C.B. Sigler
Day 1	2) Communicate to customers regarding suspension of shipments. Emphasize that this is a preliminary response pending clarification of government and corporate positions. Responsibility: D. Wood
Day 1	3) Make preliminary press release (prepared in advance) stating that operations have been suspended and supplying background information on our PCB control efforts, status of replacements. Responsibility: D.R. Bishop NOTE: First confirm that action (1) above is in force.

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<u>Timing</u>	<u>Action</u>
Day 1	4) Communicate situation to other affected Monsanto operations. -Krummrich production planning - D.T. Mayer -Process Chemicals Marketing (CS Acid, Muriatic) - J.F. Winkler -Anniston Plant (Biphenyl) - W.E. Voss -Purchasing (TCB, Drums) - B. Byrne Responsibility: E.M. Potter
Day 2	5) Determine precise details of ban: Marketing (D. Wood), Product Acceptability (J.C. Weber), Washington Office (W. Easley), Legal (W. Withers/T. Bottini), and report to Business Director. Coordinating Responsibility: D. Wood
Day 3	6) Review this plan to determine whether it fits the circumstances and make recommendations to the CAC on policy and implementation. Responsibility: R.G. Potter

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ATTN: [REDACTED]

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B. CAC Policy Decisions

After the precise nature of the ban has been determined, recommendations will be made on the following points (revised as indicated by the nature of the ban).

Domestic

1. Date of final production.
2. Shipment of inventory.
3. Customer commitment to orders on books but unshipped.
4. Incinerator returns (maximum rate 300,000 pounds per month).
 - a. All returns invoiced a price to fully cover incineration cost.
 - b. All customers given equal opportunity to use service.
 - c. COP to be set up to handle.
 - d. Alert other incinerator services of our policy.
5. No change in policy on refusal to ship transformer makeup requirements to transformer users. They should still obtain product from transformer manufacturer.
6. What assistance we will give on customer plant decontamination.
 - a. Capacitor/Transformer manufacturers.
 - b. End users -- will refer to equipment manufacturers (let our customers know we will do this).
7. Position on replacement fluid from Monsanto.

U.S. Export

1. Recommend cease shipments two months after we cease domestic shipments.
 - a. Documentation/L of Credit/Import licenses involve longer lead time and possibility of legal liability if we shut off immediately.
 - b. Additional flexibility in inventory run down.

Ex-U.S.A.

- a. Maintain U.K. production and take separate decision within one month of a U.S. ban.
- b. MESA should avoid commitment to long term supply contracts.

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C. Follow-up Actions After CAC Approval of Detailed Policy

<u>Timing</u>	<u>Action</u>
Day 4	1) Appoint Administrative Coordinator for 3-6 month period. Responsibility: R.G. Potter
Day 4	2) Briefing meeting to define policy and announce appointment of coordinator to: a) Business Group b) COP c) Sales Force d) Research e) P.R. f) Washington Office Responsibility: R.G. Potter
Day 4	3) Notify Customers by: a) Telephone to most senior management contact -- Marketing
Day 5	3) b) Certified express letter to: -- Office of the President -- Purchasing Manager of use locations -- Confirmation to telephone contact (NOTE: Direct all immediate customer responses to Marketing Group.) Responsibility: D. Wood
Day 5	4) Notify Manufacturing, Company-wide, to minimize impact on operation of Askarel units. Responsibility: R.A. Pohl to G.L. Bratsch

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<u>Timing</u>	<u>Action</u>
Day 5	5) Resume production and shipments as permitted by the approved policy, if any. Responsibility: R.A. Pohl E.M. Potter
Day 5	6) Brief corporate marketing directors with other sales to dielectric customers on policy. Responsibility: D. Sliney
Day 6-8	7) Notify Federal/State agencies of policies. Responsibility: Washington Office- W. Easley
Day 5	8) a. P.R. release on policy.
Day 6	8) b. P.R. prepare Q&A sheet on policy.
Day 10-15	8) c. Arrange series of paid advertisements Responsibility: D.R. Bishop
Day 6-7	9) Prepare form letters a. Transformers users b. Capacitor users Responsibility: D. Wood
Day 8	10) Brief U.S. Export Managers on export policy. Responsibility: C. Paton/D. Wood

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<u>Timing</u>	<u>Action</u>
Week 2-3	11) Management/Marketing meetings with customers Responsibility: D. Wood
Week 2	12) Notify U.S. Export customers of policy. Responsibility: Area Managers
Month 2	13) Upon completion of final customer shipments, move all Monsanto PCB inventories to Krummrich incinerator. Responsibility: E.M. Potter
Month 2	14) Initiate decontamination of Krummrich PCB facilities (see detailed decontamination plan). Responsibility: R.A. Pohl

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4. PCB Emergency Plan - Telephone List

	<u>Office</u>	<u>Home</u>
R.G. Potter	4-2142	469-1835
<u>Manufacturing</u>		
R.A. Pohl	4-2243	991-5455
A.E. Leisy	812-2019	966-5608
R.W. Flint	812-2043	849-0758
D.T. Mayer	812-310	618-286-3483
W.E. Voss	823-205-293	205-237-5834
<u>Marketing</u>		
C. Paton	4-2529	227-7581
D. Wood	4-2623	536-2161
<u>Medical/Prdt. Acceptability</u>		
J.C. Weber	4-2027	961-7693
Dr. G. Roush	4-2191	997-2234
W.B. Papageorge	4-2086	878-3513
<u>Legal</u>		
W.W. Withers	4-2851	227-8345
T. Bottini	4-2872	725-0677
<u>Distribution</u>		
E.M. Potter	4-2443	567-6043
C.B. Sigler	4-2428	618-234-9945
R.A. Sipes	4-2431	821-0938
<u>Washington Office</u>		
W.K. Easley	821-4548	301-299-9587
<u>Public Relations</u>		
D.R. Bishop	4-2891	469-1377

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