

J. J. Zeman - B2SK

December 15, 1975

Emergency Plan - PCB's

R. G. Potter

Attached for your review is the PCB Emergency Plan. After you have had a chance to look it over, I would like to sit down with you and answer any questions you may have.

I am sure your calendar is as full as mine, but I think we should meet as soon as you have had a chance to look at the plan and we are able to schedule a meeting.

In addition to the plan itself, we have included a sheet titled "Policy Decisions Needed for CAC Approval", another sheet on preliminary actions and PCB Emergency Plan Telephone List.

J. J. Zeman

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Attachments

DSW 185202

STLCOPCB4051448

EMERGENCY PLAN - PCB's

Scenario - Immediate ban on production, sale or use of PCB before volume production of MCS 1238 is ready.

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

A. Immediate Actions Upon Notification of Ban

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
2. 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

Timing: Upon notification from R.A. Pohl that item A.1 is complete.

3. Communicate situation to other affected Monsanto operations.
 - a. Krummrich production planning - D.T. Mayer
 - b. Process Chemicals Marketing (CS Acid, Muriatic) - J.F. Winkler
 - c. Anniston Plant (biphenyl) - W.E. Voss
 - d. Purchasing (TCB, drums) - B. Byrne

Responsibility: E.M. Potter

4. 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

5. Review this plan to determine whether it fits the
circumstances and make recommendations to the CAC
on policy and implementation.

Responsibility: R.G. Potter

Timing: Within 2 business days .

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

1. Appoint Administrative Coordinator for 3-6 month
period.

Responsibility: R.G. Potter

2. Briefing meeting (first day) 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

3. Notify Customers by:

- a. Telephone to most senior management contact -
Marketing (first day)
- 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

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4. Notify Manufacturing, Company-wide, to minimize impact on operation of Askarel units.
Responsibility: R.A. Pohl to G.L. Bratsch
5. Resume production and shipments as permitted by the approved policy, if any.
Responsibility: R.A. Pohl
E.M. Potter
6. Brief corporate marketing directors with other sales to dielectric customers on policy (second day).
Responsibility: D. Sliney
7. Notify Federal/State agencies of policies (3-5 days).
Responsibility: Washington Office - W. Easley
8.
 - a. P.R. release on policy (second day)
 - b. P.R. prepare Q&A sheet on policy (third day)
 - c. Series of paid advertisements (7-15 days)
Responsibility: D.R. Bishop
9. Prepare form letters (third-fourth day).
 - a. Transformer users
 - b. Capacitor users
Responsibility: D. Wood
10. Brief U.S. Export Managers on export policy (fifth day).
Responsibility: C. Paton/D. Wood
11. Management/Marketing meetings with customers (second-third week).
Responsibility: D. Wood
12. Notify U.S. export customers of policy (second week).
Responsibility: Area Managers
13. Upon completion of final customer shipments, move all Monsanto PCB inventories to Krummrich incinerator.
Responsibility: E.M. Potter
14. Initiate decontamination of Krummrich PCB facilities (see detailed decontamination plan):
Responsibility: R.A. Pohl

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EMERGENCY PLAN - POLICY DECISIONS NEEDED FOR CAC APPROVAL

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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Preliminary Actions

1. Persuade customers (capacitors) to buy and increase inventory of Aroclor/Capacitors/Inventories at users to give 4-6 months bridge.
Responsibility: D. Wood (first contact by 2/15/76)
2. Persuade customers to accelerate MCS 1238 approval programs.
Responsibility: D. Wood (contact by 2/15/76)
3. Confirm no continuing contractual obligations to supply.
Responsibility: D. Wood (12/31/75)
4. Prepare survey of Askarel equipment used by Monsanto.
Responsibility: G.L. Bratsch (request to GLB by 12/22/75)
5. List corporate sales to all dielectric customers.
Responsibility: R.E. Hatton (12/31/75)
6. Prepare Tentative P.R. statement.
Responsibility: D.R. Bishop (1/1/76)
7. List names of contacts to call at all customers.
Responsibility: D. Wood (12/31/75)
8. Define detailed decontamination procedure for use at Krummrich and possible adaptation for customers.
Responsibility: J.R. Savage (1/5/76)
9. Prepare recommendation on advice to customers re decontamination.
Responsibility: D. Wood (2/1/76)
10. Develop list of publications for potential ad campaign.
Responsibility: D.R. Bishop (12/19/75)

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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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