**Monsanto**

FROM (NAME & LOCATION): David Wood-St. Louis-B2SD

DATE: May 29, 1975

SUBJECT: PCB INCINERATION

REFERENCE:

TO: C. Paton
J. R. Savage
E. M. Potter-B2NK
W. B. Papageorge
R. C. Sprague-B2NG

A. Leisy-1740
G. Johnson-1740
C. Field-B2NE
T. L. Gossage
W. Withers-B2SA
W. Lubic-B1NB

We have all been concerned by the number of incineration shipments which have increasingly resulted in:

a) Need to clean-up trucks
b) Need to specially dispose of solid wastes.

Apart from cost involved and diversion of productive labor, I understand your concern about the risk of increasing PCB in our own effluent due to the special handling involved.

The causes of our problems are:

1. Customer use of old corroded drums.
2. Inadequate securing of bungs.
3. Overfilling of drums - allowing no room for expansion in-transit.
4. Customer does not always segregate solid/liquid waste.
5. Forklift damage to drums in loading at customers.
6. Insufficient inspection of load by carrier (not aware of hazard).
7. Drums not always labeled properly.
8. Drums not loaded securely.

While all the above are familiar to us who deal with delivery of liquids in drums, we need to correct these deficiencies at our customers. I believe that the more irresponsible of our customers will not improve without some financial sanction.

I propose the following action:

A. Modify standard letter covering each return.
   1. Clean up costs to customer account.
   2. Segregation of solid waste and return to sender to customer account.
   3. Add instruction sheet for carrier.

   I attach present letter (Attachment A) and proposed draft of standard letter (Attachment B) and carrier instruction (Attachment C)

MONS 029731

B. Letter giving details of new conditions for incineration (Attachment D).

This letter should be taken by salesmen to responsible management level at each U.S./Canadian approved customer.

It explains our current problem and the potential impact of the irresponsible on the total industry. Draft is attached.

C. New label for returned drums (Attachment E)

This incorporates latest warning statements and gives instructions in event of spill to contact 1) shipper; 2) Monsanto.

D. Guide for customers shipping department.

To improve understanding of procedure at operating level. Draft will be circulated week June 2nd.

Cumming, I would appreciate your and Tom Gossage's approval to the proposed action.

Would all copyees please comment by June 7 in order that we can proceed as quickly as possible?

Thank you.

David Wood

/deb
Attachments

Attachment A (Present)

# Monsanto

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

This will confirm our
concerning incineration of your fluids.
Enclosed are pre-addressed drum return labels
marked "Disposal Only". The drum contents must be
clearly indicated on each label.

To prevent leakage, please use return drums which meet DOT 17E specifications (55 gallon drums, 18 gauge, 2 bung head; 5 gallon drums, 24 gauge minimum). The outside of the drums must be clean, free of fluid and not leaking. Cleanup or other costs affecting the carrier which are related to fluids leaking from drums will be charged to the shipper.

Please show Monsanto Identification Number on the bill of lading and on each drum. The freight classification is Plastic Liquid NOI and the release value is 50¢ per pound. Please ship all drums freight prepaid to:

Monsanto Industrial Chemicals Co.
Department 831 , Incinerator
Sauget, Illinois 62201

Incineration charges are 5¢ per pound, with an $8.00 per drum handling charge for each drum being returned. Please advise if you want us to invoice these charges against a specific purchase order number.

MONS 029733

Solids such as sawdust, rags or sludge and aqueous fluids cannot be handled in our incinerator. For these materials we suggest you check local authorities and your own environmental department for an approved disposal method. Personnel in our Sauget, Illinois, plant have been instructed to refuse receipt of drums containing these materials and to return them to the sender at the sender's expense.

Thank you for your cooperation. If you have additional questions, please phone me (314) 694-3024, or contact me by letter at the above address.

Sincerely,

C. R. Field

C. R. Field
Supervisor
Customer Service Center

Enclosures

MONS 029734

Attachment B (Suggested New Letter)

New Form Letter for Incineration Returns

This will confirm our ..... concerning incineration of your ..... fluids.

Enclosed are _____ pre-addressed drum return labels marked "Disposal Only." The drum contents must be marked clearly on each label.

To prevent leakage, please use return drums which meet DOT 17E specifications (55 gallon drums, 18 gauge, 2 bung head; 5 gallon drums, 24 gauge minimum). The outside of the drums must be clean, free of fluid and not leaking. Drums should be free from corrosion and bungs tightly sealed. As a condition of return for incineration, clean-up or other costs relating to fluids leaking from drums will be charged to the shipper.

Please show Monsanto identification Number _____ on the bill of lading and on each drum. The freight classification is Plastic Liquid NOI and the release value is 50¢ per lb. Please ship all drums freight prepaid to:

Monsanto Industrial Chemicals Company
Department 831, Incinerator
Sauget, Illinois 62201

Incineration charges are currently 5¢/lb. with an $8.00 per drum handling charge for each drum returned. Please advise us if you want us to invoice these charges against a specific purchase order number.

Please note that solids, such as sawdust, rags or sludge cannot be handled in our incinerator. Additionally, liquids containing more than 1% water can cause damage to the refractory lining of our incinerator and as such, cannot be accepted. For these materials, we suggest you check local authorities and your own environmental department for an approved disposal method. We also refer you to ANSI CIOT Guidelines for handling and disposal of capacitor and transformer askarch containing chlorinated biphenyls. This is available from American National Standards Institute, 1430 Broadway, New York, New York 10018.

It is a condition of shipment to us for incineration that any drums containing solid materials will not be accepted and will be returned to the sender at the sender's expense. Additionally, if we, in our judgement, need to separate and repack unacceptable solids or liquids for safe return to sender, a handling charge of $100 will be billed to sender.

We recommend that the attached instruction should be attached to the carrier's copy of the bill of lading, and be brought specifically to the attention of the driver.

We thank you for your cooperation in arranging the appropriate handling of this consignment for incineration. Please call us again to set up any new incineration arrangements which may be needed. We need to send you instructions for each return to ensure that you are familiar with any changes in our procedures.

If you have additional questions, please phone me (314)694-3024 or contact me by letter at the above address.

Sincerely,

C. R. Field

/deb

Attachment C

ATTENTION: DRIVER

This shipment contains POLYCHLORINATED BIPHENYL (PCBs) which some studies have shown may be persistent, an environmental contaminant and possibly injurious to certain forms of bird, aquatic and animal life.

Prevent any entry into the environment through spills, leakage, vaporization or otherwise. Spills and leakage must be collected.

DO NOT STORE with food, animal feedstuffs or pharmaceuticals. Keep containers TIGHTLY closed. In case of leak or spill, contact:

1. Shipper
2. Monsanto Company - call collect (618)271-5835.

IMPORTANT: DO NOT LOAD any drums which are leaking or not tightly sealed.

LOAD securely to prevent drum damage in transit.

Attachment D

All Approved U.S./Canadian Dielectric Customers

Dear Sirs:

We wish to bring to your attention problems associated with disposal of waste chlorinated biphenyl products in our incinerator at Sauget, Illinois.

1. Many recent returns have been in completely unsuitable drums which have been severely corroded and unsealed. Some drums have been overfilled so that expansion in-transit has not been contained. Loose stowage in trucks has resulted in movement of the load in-transit.

   The results have been spillage into the truck and in some cases contamination of other goods in the truck, which then had to be destroyed. We have had to hold trucks at our plant for cleaning, attracting demurrage charges and diverting plant personnel from productive tasks.

   The potential cost of clean-up had such leaks in-transit caused detectable environmental contamination would be significant.

   The truck cleaning at Sauget increases the risk of escape of PCB-containing effluent from our own plant which could jeopardize our ability to continue normal controlled production.

   Such irresponsibility on the part of a few can have results which could effect the continued availability of PCBs to the whole capacitor and transformer industry.

   We seek your assistance in ensuring that returns from your company are appropriately packed, sealed and stowed for return.

   As from June 1, 1975, costs incurred in handling inadequately packed returns will be billed to the company involved.

2. We have requested prior contact before EACH return so that we can send the required number of PCB Warning labels. We are still receiving drums without warning labels. In the event of a spill in-transit, the absence of warning labels could be a factor in assessing liability. We seek your help in ensuring that we can send you enough suitable labels for each return.

3. We attach a copy of the form letter that we will be sending with labels to advise on correct return procedure.

   You will note that this letter advises that our incinerator cannot handle solid waste. It is designed to handle liquid streams only. We still receive drums containing rags, sawdust, and metal and wooden components. In the past, our plant personnel have taken care to separate solid wastes and have arranged separate special disposal of the solid wastes. This will not continue. As from June 1, 1975, a charge of $100 will be made if labor is diverted to separating solid waste. Additionally, the solid waste will be suitably packaged and returned freight collect to the sender.

   While we wish to continue to assist the electrical industry in disposal of liquid waste chlorinated biphenyl in our incinerator, we cannot and will not permit the service to become inoperable because of abuse by a small number of companies.

We thank you for your assistance in regulating returns from your company.

David Wood

/deb

FROM

SHIP TO

Attachment E.

MONSANTO COMPANY
Department 831
SAUGET, ILLINOIS 62201

MONS 029740

# RETURNED

## WASTE FLUIDS

## FOR INCINERATION ONLY

PRODUCT NAME

WEIGHT

IMPORTANT:

This product contains POLYCHLORINATED BIPHENYLS (PCB's) which some studies have shown may be persistent, an environmental contaminant and, possibly injurious to certain forms of bird, aquatic and animal life.

PREVENT ANY ENTRY INTO THE ENVIRONMENT THROUGH SPILLS, LEAKAGE, DISPOSAL, VAPOURISATION, REUSE OF CONTAINERS OR OTHERWISE.

SPILLS, LEAKAGES AND WASTE PRODUCT MUST BE COLLECTED.

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

HARMFUL SUBSTANCE IF TAKEN INTERNALLY OR IF IN PROLONGED CONTACT WITH THE SKIN.

CAUSES IRRITATION OF SKIN AND EYES.

DURING SHIPMENT AVOID SPILLS AND LEAKAGE INTO INLAND WATERWAYS AND THE SEA.

CAUTION!

CONTAINS CHLORINATED HYDROCARBONS

Store away from food, animal feedstuffs and pharmaceuticals.

Keep container tightly closed.

Do not eat or smoke when using.

Avoid breathing vapours, mist or fumes.

Do not wear contaminated clothing.

Wash product from skin with soap and water.

Wash eyes by flushing with water.

IN CASE OF LEAK OR SPILL CALL ~~COLLECT 618 271-5835~~ 1 SHIPPER ~~SENDER~~ 2 MONSANTO CALL COLLECT 618-271-5835