Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
1114 Avenue of the Americas
New York, New York 10036
Phone: (212) 764-5000

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August , 1975

Dr. R. C. Ostoff
General Electric Company
100 Woodlawn Avenue
Pittsfield, MA 01201

Dear Dr. Ostoff:

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

1. Some 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, might have been significant.

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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. It would indeed be distressing if these incidents led to the inability of the industry to use chlorinated biphenyl in spite of industry efforts on ANSI C-107 and EIA ad-hoc committees.

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

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 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 the 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 as June 1, 1975, a charge of at least $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.

Sincerely,

MONSANTO INDUSTRIAL CHEMICALS CO.

P. L. Clayton
Regional Sales Manager
Specialty Products Group

PLS/gtb
Attachment
Letter

bcc: J. S. Pullman - Mt. Kisco

[redacted]

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