Monsanto

FROM (NAME & LOCATION) D. Wood - B2SD

DATE : November 24, 1975 cc: C. Paton

SUBJECT : PCB Action Plans

REFERENCE :

TO : J. Savage

Introduction:

Contingency Plan I is fairly complete if we accept the premises which support it. It would not be valid if, for example, Monsanto management decided next week to discontinue PCB's in one month. Additionally, it involves entertwining of two separate time sequences, i.e. withdrawal from PCB and introduction of replacements.

Perhaps Plan I should very simply lay out what we would do if compelled to discontinue PCB before we had a replacement for the capacitor/transformer business and evaluate the earliest possible date by which we believe we could replace Aroclor.

A separate Plan II should indicate the shortest path to having replacement products available and highlight the potential delay points and the risk of delays at such stages in relation to our having an ongoing business and the order of costs involved in unlocking such delays.

The old Contingency Plan II forms a good basis for a larger term phase out.

Looked at in this light, Plan I needs to address itself to:

1) Clarification of exact conditions of ban.

2) Clearance of final detailed plan by CAC.

3) Formal announcement to customers (Reconfirm new contractual status).

   a) When we stop production.
   b) When we stop supply.
   c) Allocation of inventory.
   d) Reasons for discontinuation.
   e) Policy on transformer make up.
   f) Policy on disposal of unused inventories and old equipment.

4) Domestic sales vs. U.S. Export sales. Position of European production.

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5) Statement on status of Monsanto replacement fluids.

6) Plant decommissioning, decontamination of equipment, site and tank cars, plant dismantling.

7) Administrative rearrangement of personnel.

8) Action on law suits.

9) Determine need for continued worker surveillance and continued plant effluent surveillance.

10) A separete section should relate to continuity of supply of polyphenyl related products.

Plan II is in embryo form within the plans for the CEA 3023 project which you circulated.

The key delay factors in the capacitor program are:

1) Key capacitor approval programs
2) G.E. automation program
3) Environmental approval
4) Fire safety acceptance

} Market Related

1) Interim production based on toll RM's.

2) Approval to move to establish interim production.

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