

W. B. Papageorge - B2NK - General Offices

February 10, 1972

PCB Disposal - Ex. U. S.

cc: W. R. Corey - B2SL
H. S. Bergen - B2SL
T. L. Gossage - B2SL
J. F. Stapleton - B2SA
E. Greene - A2NA

I have been informing correspondents from areas outside of continental U. S. that the preferred method for disposal of scrap PCB fluids or solid waste containing PCB is by incineration at temperatures exceeding 800° C with provision for scrubbing the resulting acidic gases to prevent atmospheric pollution.

In most cases there are no facilities available which are capable of providing the conditions required. Some Canadian customers have used our Sauget, Illinois service and the Chem Trol Services, Inc., unit at Blasdel, New York. Monsanto-U.K. has made arrangements with Purle Bros. at Essex. I understand Progil and Bayer have the capability but I do not know if they offer this service generally.

Lacking an incinerator, the use of properly located, properly operated landfills can be considered, preferably with the approval of local authorities.

W.B. Papageorge
W. B. Papageorge

WBP:gw

*consistent
with
local
requirements
and*

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Monsanto

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FROM (NAME & LOCATION): B2SC Cumming Paton

DATE: March 13, 1972
SUBJECT: PCB Disposal - ex-U.S.A.
REFERENCE:
TO: 5040 J. N. HAGGART
5270 T. KATAYAMA
A2NH F. J. CAMARGO
A2NG G. W. SPERBERG
5210 K. C. TOMLINS
5330 R. K. LOUIS
5340 G. CHEW
5020 R. F. GARNSWORTHY
5080 D. GOODWILLIE

CC: A2NA E. Greene
B2SL T. L. Gossage
B2SL H. S. Bergen
B3NC W. S. Clark
B2NK W. B. Papageorge
→ B2SA J. F. Stapleton
B2SL W. R. Corey
B2SC P. G. Benignus
B2SC J. J. Roder
B2SC D. E. Roush
5040 P.J.A. Marsh
B2SF N. T. Johnson
1010 E. L. Shimley
1070 H. R. Ford
1800 D. R. Hansen
1650 P. L. Slayton
1460 D. W. Stegen
B2SD P. W. Ganp

See attached.

Cumming Paton

CS
Attachment

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PCB Disposal ex-U.S.A.

Attached is a statement by Bill Papageorge on PCB disposal ex-U.S.A.

Several points to make are:

1. We did not use the words "recommend" or "suggest." This is deliberate and a customer should reach his own decision.
2. Disposal must be such that the customer assumes full responsibility therefor.
3. Responsibility rests with our customers regarding safe disposal of used or unused PCBs already in their possession. They should be given the information as it is written up by Bill Papageorge. In addition, use the following guidelines:
 - (a) Enlist the help of Monsanto's local legal counsel and be guided by his advice.
 - (b) Where Monsanto has manufacturing operations overseas, you may already be familiar with disposal of chemical wastes safely. Please check on this but get legal guidance before passing information on this to customers.
 - (c) Landfills should be dry with no possibility of leaking into streams or water supplies.
 - (d) Care should be taken in draining heat transfer systems that spillage is avoided.

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- (e) If drums are used to hold PCBs (be it dielectric, plasticizer or heat transfer), they should be leak-free.
- (f) We do not recommend that our customers (including dielectric ones) resell used Monsanto PCBs for any use to others.

4. Monsanto Inventory of PCBs

Where local Monsanto companies have PCB inventories, the foregoing guidelines apply except, of course, that safe disposal is Monsanto's problem. As a result, the following points are pertinent:

- (a) We realize in many countries drums have value; nevertheless any PCB buried in proper landfills should be in drums. So supervision by Monsanto will be necessary to see that this is complied with and that material is not drained out into the landfill and the drums resold.
- (b) Monsanto's own stocks should be buried in drums not identified with Monsanto but with a label indicating contents and hazards.

5. U.S. Regional Managers

If any of your customers with overseas locations asks what they do about PCB disposal overseas, do not use U.S. guidelines but refer their overseas personnel to the following:

Europe : J. N. Haggart, Brussels

Canada : D. Goodwillie, Montreal

Latin America : Mexico
 South America
 Central America
 Caribbean } : F. J. Camargo, St. Louis

Australia/New Zealand : R. F. Garnsworthy, Melbourne

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A.I.P.C. : Africa
India
Pakistan : G. W. Sperberg, St. Louis
Ceylon

Japan : T. Katayama, Tokyo

Asia-Pacific : Malaysia
Singapore : G. Chew, Singapore
Indonesia

Philippines
Thailand : R. K. Louis, Manila
S. Vietnam

Korea
Hong Kong : K. C. Tomlins, Hong Kong
Taiwan

Cumming Paton

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ON (NAME & LOCATION) B2SC Cumming Paton

DATE March 16, 1972
SUBJECT PCB Disposal - ex-U.S.A.
REFERENCE memo dated March 13
O 5040 J. N. HAGGART
5270 T. KATAYAMA
A2NH F. J. CAMARGO
A2NG G. W. SPERBERG
5210 K. C. TOMLINS
5330 R. K. LOUIS
5340 G. CHEW
5020 R. F. GARNSWORTHY
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B3NC W. S. Clark
B2NK W. B. Papageorge
→ B2SA J. F. Stapleton
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B2SC P. G. Benignus
B2SC J. J. Roder
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1010 E. L. Shimley
1070 H. R. Ford
1800 D. R. Hansen
1650 P. L. Slayton
1460 D. W. Stegen
B2SD P. W. Gann

Attached is W. B. Papageorge's statement on PCB disposal
ex-U.S.A. which was mentioned in the previous memo but
not included.

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PCB Disposal Outside Continental U.S.A.

I have been informing correspondents from areas outside of continental U.S. that the preferred method for disposal of scrap PCB fluids or solid waste containing PCB is by incineration at temperatures exceeding 800°C with provision for scrubbing the resulting acidic gases to prevent atmospheric pollution.

In most cases there are no facilities available which are capable of providing the conditions required. Some Canadian customers have used our Sauget, Illinois service and the Chem Trol Services, Inc., unit at Blasdell, N.Y. Monsanto - U.K. has made arrangements with Purle Bros. at Essex. I understand Progil and Bayer have the capability but I do not know if they offer this service generally.

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