#5

OUTSIDE PROCESSORS

Select companies for support of Monsanto operations — through product conversions, custom manufacture, formulating, by-product sales, waste management, and other services supporting Monsanto businesses — which will operate with concern for worker safety, regulatory compliance, community protection and protection of the environment.

PROGRAM

1. Monsanto will utilize only outside processors which have been selected and periodically assessed to assure:
   (a) Their ability to adequately protect the public, employees and the environment from any effect of Monsanto chemicals, products or wastes.
   (b) Their compliance with all applicable laws and regulations.
   (c) Their knowledge of potential hazards and any applicable manufacturing requirements associated with Monsanto materials handled.
   (d) Their use of approved waste disposal methods and locations, with recordkeeping of all material use and waste disposal.
2. Selections and assessments shall be documented and approved by the Operating Unit Director of Environmental Operations and an appropriate contractural arrangement shall be established with each firm prior to startup of operations.
3. Outside "processors" include firms which provide services related to Monsanto chemicals, products or wastes. "Primary" firms will receive an on-site assessment, management approval, and a written contract.

   Secondary firms should be assessed and be subject to approval and contracts when high hazard materials or Class B poisons are involved, or whenever the situation involves a significant risk.

   Primary services include:

Conversions	Barge Cleaning[1]
Processing	Drum Cleaning/Reclaiming[1]
Blending	Waste Material Sales
Formulations	Waste Hauling (including oil)
Material Recovery/ Reclaiming	Hazardous Waste Disposal
	Waste Oil Disposal
Material Purification	Waste Oil Reclaiming
Packing or Repacking	Transformer Retrofill
Bulk Truck Cleaning[1]	
Tank Car Cleaning[1]	

[1]Applicable to hazardous products or Monsanto owned or leased vehicles.

   Secondary services include:

   Bulk Terminals
   Transloading
   Fulfillment Houses
   Packaged Goods Warehousing
   Non-hazardous Waste Disposal
   Vessel and Equipment Cleaning

   Excepted are services performed by established major chemical firms (approved by the Unit Director of Environmental Operations), publicly owned treatment works, sales of wastes which are equivalent to virgin chemicals in commerce and transformer retrofill where wastes are retained under Monsanto control.
4. Assessments are to be performed prior to initial use and at a frequency recommended in the prior assessment (normally one to three years).
5. MCC Environmental Engineering maintains a corporate-wide database of all outside processors to avoid redundant assessments and contracts and to facilitate use of approved contractors.
6. The above program elements will be implemented at ex-U.S. locations, but with modifications as necessary to reflect local limitations, restraints to compliance, and the extent of Monsanto's operating control. Status and direction of the local program will be reviewed in planned environmental audits of these facilities.

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STATUS/OBSERVATIONS

- A revised outside processor procedure for assessment and approval of Monsanto's contractors was finalized in September, 1985. A total of 23 types of contractors and disposal firms were incorporated into the program, with low-risk and third-party involvements generally excluded to properly focus our resources. The standard procedure places approval responsibility and latitude for program adaptation in the hands of the DEOs.
- A corporate-wide database on all outside processors has been created and is being maintained by MCC Environmental Engineering. As of June, 1985 the database shows:

	No.	%
Listed Outside Processors	385	100
Approved Assessments	159	41
Audits/Reaudits Current	117	30
With Contracts	214	56
Without Contracts	171	44

  Program status and required resources are under current review. Tentative direction is toward use of fewer outside processors, and toward assignment of assessment responsibilities to multiple groups to implement.

- With the exception of MAC formulators, outside processors for ex-U.S. plants have largely not yet been integrated into the program or the database. This need will be addressed as a site-specific issue in planned plant audits.

(Revised and Approved: Environmental, Safety & Health Committee June 25, 1987.)

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