Monsanto

FROM (NAME & LOCATION) W. R. COREY - B2SL

DATE June 14, 1972

SUBJECT PCB/PCT PHASE OUT PROGRAM

REFERENCE

CC W. S. Clark - B3NC
W. B. Papageorge - B2NA
J. F. Stapleton - B2SA

TO H. S. Bergen - B2SL

We are fast approaching the date when we will have completed the implementation of the phase out program adopted last fall on our PCB/PCT product lines. It will be necessary for us to certify to Messrs. Cunningham and Sommer, as well as to the Board of Directors, that the job has been done completely.

As we all know, this means there are no further sales of PCB's to any one anywhere--and this includes any product containing PCB's--except for dielectric uses such as transformers and capacitors. It further means that after June 30, 1972, there will be no future sales of PCT's or monochlorobiphenyl for any uses whatsoever. Any remaining stocks of any products containing either PCB's or PCT's must be either destroyed or otherwise properly disposed of.

The one domestic exception remaining to this entire program, to the best of my knowledge, is Goodyear Tire and Rubber Company where continued sales of PCB Therminol FR have been approved under the hold-harmless document which was signed by this company on February 8, 1972. This document agreed we would continue to sell PCB's for their Applegrove, W. Va., plant for a period of 6 months while they changed to an alternate fluid. The 6-month period ends on August 7, 1972, and therefore no future sales should be made to Goodyear after that date.

In Europe, limited PCB hydraulic fluid sales are continuing to the German mining industry under an approved exception until completion of tests on substitute fluids.

When we started this phase out program a list of all the PCB/PCT-containing products which we sold was prepared. The list (copy of which is attached) identified the products by product name in the four following categories: Plasticizers, Dielectrics, Heat Transfer, and Industrial Fluids. There are many different tradename products in this list and I'm sure it was carefully prepared at the time. I'm requesting, however, that the list be carefully reviewed again now to be sure that there are no odds and ends of any products containing PCB's or PCT's under any tradename whatsoever which have not been discontinued. There were two products on the list classified under the experimental terminology "MCS" and it may be that we have used these

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code letters for something else. Let's be certain we haven't missed anything because it is important for all of us that this phase out program be completely clean when we send forward our termination certification.

One further comment and that has to do with the Therminol 77 we discussed the other day. This product should immediately be withdrawn from our product line as currently formulated in view of the possibility of trace quantities of PCB's as impurities.

We originally had assigned Bill Papageorge the responsibility for coordinating all of the worldwide agreements and programs involved in the phase out program. By copy of this memo I am asking Bill to now make the final check and confirm to us that the program is now completed in its entirety.

This program has been a hard job and many people have worked hard at it. Let's go out with flying colors.

W. B. COREY

/jf

Attachment

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