Monsanto

FROM (NAME LOCATION PHONE): J. H. Craddock - St. Louis G3WA 4-4764

DATE: November 17, 1980

SUBJECT: PCB'S - CORPORATE INVENTORY/ ANNUAL REPORT REVIEW

REFERENCE:

TO: All Monsanto Company Plant Managers/R&D Centers (See Distribution)

C. F. Callis - B3CA
W. D. Carpenter - C2NA/ E. C. Spurrier - 1920
D. E. Cayard - C2NC
N. B. Galluzzo - E2SB
C. E. Hathaway - R3B
P. H. Hobson - G5WG
R. J. Janowiecki - 1250
G. L. Jessee - C2SA
R. W. Kienker - E2SA
J. E. Lipe - 1690
R. S. Nelson - G3WA
W. B. Papageorge - G4WA
W. R. Robirds - F2WA/ C. D. Malloch - F3EA
M. F. Weishaar - G4WA

The Toxic Substances Control Act final rules for Polychlorinated Biphenyls (PCB's) cover all regulated aspects of these compounds, including use, disposal, storage, recordkeeping and monitoring. Required records are designed to show the disposition of each site's PCB's and PCB items and serve as a basis for an annual PCB accounting document to be reported to TSCA by July 1, covering the previous calendar year.

As part of the Corporate program to manage the PCB issue, I am developing a Corporate Monsanto Inventory of all PCB's and equipment in use and stored for disposal. Since no guidance for PCB recordkeeping has been provided since March, 1978, I am enclosing two new summary forms which when completed will provide the information required by TSCA, plus certain data needed for the Corporate Inventory.

Strict enforcement of these recordkeeping rules by TSCA inspectors could result in significant fines and embarrassment for the company if the documents are not in proper form. Development of the Corporate Inventory based upon your current records and annual document will enable you to test your current recordkeeping to determine if it is adequate or needs fine-tuning. To expedite the task of completing this request, detailed instructions for completing forms F and G are also attached.

Please have the attached summary forms completed by your staff member responsible for PCB storage/records and return to me before December 4. Include data from your annual report for calendar year 1979 updated to the present (November 17, 1980). The Corporate Inventory will be compiled by me and reviewed with Senior Management early in December. If any questions arise regarding the Corporate Inventory/Review of Annual Document for facility inventory of PCB's, please phone - St. Louis 4-4764. All locations should return completed summary document even if the totals are zero.

J. H. Craddock, Corporate PCB Surveillance Coordinator

IN - 10 (REV. 8/77)

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FORM F AND G

INSTRUCTIONS FOR COMPLETION

Item

1 Page number F-___ or G-___ of total number of pages in form.

Prefix F, G, etc., denotes exact form.

*2 Period covered - Insert calendar year covered in report. Regulations specify reporting on calendar year basis.

3 Insert name of person preparing this summary.

4 Insert title of person preparing this summary.

5 Insert phone number (include area code, extension, state location as appropriate, e.g., 4-4764 St. Louis).

6 Insert location of person preparing report, e.g., General offices - G3WA; Delaware River Plant - Administration Building; etc.

*7 Insert date this summary prepared.

Regulations specify preparing this summary before July 1 of each year for the preceding calendar year.

*8 Monsanto operating unit name, e.g., Monsanto Industrial Chemicals Co., Monsanto Enviro-Chem, Monsanto Corporate Research Laboratories, etc.

*9 Insert site/location covered in this report, e.g., W. G. Krummrich plant, Corporate Research Laboratory, Akron Research Laboratory, etc.

*10 Address of site. Include number, street, city, state, zip code covered in this report. (Do not use P.O. Box here.)

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Item

*11 Storage facility location at site, e.g., building number, unit name, warehouse number, etc.

12 Site identification. Any local identification, e.g., PCB warehouse, old "doorknob" storage tank, etc.

*13 Mailing address of site. If different from item 10, e.g., P.O. Box number, city, state, zip code.

*14 Insert total weight in kilograms of any PCB substances or mixtures in PCB containers/items. Regulations require weights in kilograms, but specify --

"Note - Any requirements for weights in kilograms of PCB'S may be calculated values if the internal volume of containers and transformers is known and included in the reports, together with any assumptions or the density of the PCB's contained in the containers or transformers."

The calculations must be kept as part of the records for the site and should be attached to the appropriate Detailed Inventory form for future reference as part of the "annual document for the facility." (Do not include these calculations with summary reports -- forms F and G.)

15 Volume of PCB's. Insert total volume of PCB fluids present, in gallons. Use the suffix (a) for actual volume either measured or known from full container size if appropriate; (e) for estimated, e.g., a partially filled container. Examples:

55(a) indicates a full 55-gallon drum of fluid.
30(e) may indicate a 55-gallon drum which is slightly over half-full estimated to be 30 gallons of material.

16 Insert total number of items/containers in this category of the report, e.g., liquid PCB's in storage may be in 150 gallons; some full, others only partially full. Some containers may be smaller than 55-gallon drums. As a general Monsanto guide, no containers in storage should be smaller than a 5-gallon pail. Smaller quantities may be stored in larger containers, e.g., 55-gallon drums as a "batch" by including the complete package units -- small bottles, cans, sample bottles.

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Item

TSCA regulations discuss this procedure for combining "batches" and required records in detail. (Phone John Craddock if you need specific guidance on this point.)

17 Identification/References. This section should be used to identify sources of information for the summary report for each PCB item; e.g., Item 18 - PCB's in containers (liquids) - Records of quantities/items in this total may be found in this site Form D detailed inventory pages D1 to D25.

(This provides information for you, your successor, your designee or any other responsible personnel to reconstruct and defend your summary, e.g., in case of an EPA inspection/audit of facilities.)

*18 This section includes liquid PCB's in containers, e.g., drums.

*19 This section includes small PCB capacitors (contain less than 1.36 kg (3 pounds) of PCB's) in containers, e.g., drums.

*{26} This section includes solid (non-liquid) PCB debris, e.g., earth, gloves, absorbent material, rags, etc., in containers, e.g., drums.

*20 This section includes transformers having PCB fluid concentration range 50-499 ppm. (These are defined by EPA as "PCB Contaminated Transformers.")

*21 This section includes transformers having PCB fluid concentration range equal to or greater than 500 ppm. (These are defined by EPA as "PCB Transformers.")

{27} This section includes drained transformer shells awaiting disposal.

*22 This section includes PCB high- and low-voltage capacitors containing 1.36 kg (3 pounds) of PCB's or more.

TOWOLDMON0059857

Item

*23 This section includes "other" PCB items - List all items not included above that contain PCB's. Use a separate line for each type of item, e.g., magnets, motors, microwave ovens, vacuum pumps, etc.

24 Totals - Total all columns.

25 Certification - Signature of responsible for and person preparing this summary portion of the annual document. Include date and title of signer.

26. See guideline after item 19 above. This item appears only on form F.

27 See guideline after item 21 above. This item appears only on form F.

*These items are required by TSCA regulations.

TOWOLDMON0059858

MONSANTO COMPANY
INVENTORY REPORT - SUMMARY PART I
(FORM F)

PCB'S AND PCB ITEMS STORED FOR DISPOSAL

1. Page F-__ of F-__

2. Period Covered* January 1, ____ to December 31, ____
3. Prepared by _____
4. Title _____
5. Phone No. _____
6. Location _____
7. Date Prepared __/__/__*
8. Monsanto Operating Unit* _____
9. Monsanto Site/Location* _____
10. Address* _____
13. Mailing Address _____
11. Storage Facility Location* _____
12. Identification # Site _____

PCB Item	14. Total Weight PCB's in Kg*	15. Volume (Gal.)	16. No. Items (Containers)	17. Identification/Reference
18. PCB's in Containers* (Liquids)				
19. PCB Capacitors in Containers*				
26. PCB Contaminated Waste in Containers (Solid Debris)	XXXXXXXXXX			
PCB Transformers				
20. PCB Fluids - 50-499 ppm PCB's				
21. PCB Fluids - 500 or more ppm PCB's*				
27. Drained Transformer Shells	XXXXXXXXXX	XXXX		
PCB Capacitors				
22. Large High- or Low-Voltage*				
Other (List, e.g., motors, magnets, hydraulic systems, etc.)				
23.				
24. TOTALS				

25. Certifications:
Signature _____
Title _____
Date _____

*These items are required by TSCA regulations.

Form F 11/80

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TOWOLDMON0059859

MONSANTO COMPANY
INVENTORY REPORT - SUMMARY PART II
(FORM G)

PCB'S AND PCB ITEMS IN SERVICE (INCLUDING SPARES)

1. Page G-__ of G-__

2. Period Covered* January 1, ____ to December 31, ____
3. Prepared by _____
4. Title _____
5. Phone No. _____
6. Location _____
7. Date Prepared __/__/__*
8. Monsanto Operating Unit* _____
9. Monsanto Site/Location* _____
10. Address* _____
13. Mailing Address _____
11. Storage Facility Location* _____
12. Identification @ Site _____

PCB Item	14. Total Weight PCB's in Kg*	15. Volume (Gal.)	16. No.Items (Containers)	17. Identification/Reference
18. PCB's in Containers* (Liquids)				
19. PCB Capacitors in Containers*				
PCB Transformers				
20. PCB Fluids - 50-499 ppm PCB's				
21. PCB Fluids - 500 or more ppm PCB's*				
PCB Capacitors				
22. Large High- or Low-Voltage*				
Other (List, e.g., motors, magnets, hydraulic systems, etc.)				
23.				
24. TOTALS				

25. Certification:
Signature _____
Title _____
Date _____

*These items are required by TSCA regulations.

Form G 11/80

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