Monsanto

FROM (NAME & LOCATION): J.R. Savage - B2SL

December 15, 1975

CC:

SUBJECT : PCB Emergency Plan

REFERENCE :

TO : Messrs.

R.E.	Beal	- B2SB
D.R.	Bishop	- B1ND
R.	Davis	- B2SF
W.H.	Duffey	- E1SA
M.E.	Gibbs	- W1A
C.P.	Orr	- G2WD
W.B.	Papageorge	- B2NB
C.	Paton	- B2SK
C.	Weber	- B2SK
D.	Wood	- B2SD
J.J.	Zeman	- B2SK

Attached is the final version of our PCB Emergency Plan to be presented to R.G. Potter.

J.R. Savage

/bh
Attachment

DSW 185209

STLCOPCB4051455

EMERGENCY PLAN - PCB's

Scenario - Immediate ban on production, sale or use of PCB before volume production of MCS 1238 is ready.

Responsibility for verification of existence of a ban, initiation of this plan and verification of acceptance of responsibilities: R.G. Potter

A. Immediate Actions Upon Notification of Ban

1. Suspend chlorination operations. Suspend shipments from Krummrich Plant and warehouses (Santa Clara, Elizabeth, Los Angeles). Do not recall shipments enroute. Finish any distillation batches under way.

   Responsibility: R.A. Pohl

   Contacts: Krummrich Plant - A.E. Leisy
   R.W. Flint

   Warehouses - E.M. Potter
   C.B. Sigler

2. Make preliminary press release (prepared in advance) stating that operations have been suspended and supplying background information on our PCB control efforts, status of replacements.

   Responsibility: D.R. Bishop

   Timing: Upon notification from R.A. Pohl that item A.1 is complete.

3. Communicate situation to other affected Monsanto operations.

   a. Krummrich production planning - D.T. Mayer

   b. Process Chemicals Marketing (CS Acid, Muriatic) - J.F. Winkler

   c. Anniston Plant (biphenyl) - W.E. Voss

   d. Purchasing (TCB, drums) - B. Byrne

   Responsibility: E.M. Potter

DSW 185210

4. Determine precise details of ban:

   Marketing (D. Wood)
   Product Acceptability (J.C. Weber), Washington Office (W. Easley), Legal (W. Withers/T. Bottini), and report to Business Director.

   Coordinating Responsibility: D. Wood

5. Review this plan to determine whether it fits the circumstances and make recommendations to the CAC on policy and implementation.

   Responsibility: R.G. Potter

   Timing: Within 2 business days

B. Follow-up Actions After CAC Approval of Detailed Policy

1. Appoint Administrative Coordinator for 3-6 month period.

   Responsibility: R.G. Potter

2. Briefing meeting (first day) to define policy and announce appointment of coordinator to:

   a. Business Group
   b. COP
   c. Sales Force
   d. Research
   e. P.R.
   f. Washington Office

   Responsibility: R.G. Potter

3. Notify Customers by:

   a. Telephone to most senior management contact - Marketing (first day)

   b. Certified express letter to:

      -- Office of the President
      -- Purchasing Manager of use locations
      -- Confirmation to telephone contact

   (Note: Direct all immediate customer responses to Marketing Group.)

   Responsibility: D. Wood

DSW 185211

4. Notify Manufacturing, Company-wide, to minimize impact on operation of Askarel units.

   Responsibility: R.A. Pohl to G.L. Bratsch

5. Resume production and shipments as permitted by the approved policy, if any.

   Responsibility: R.A. Pohl
   E.M. Potter

6. Brief corporate marketing directors with other sales to dielectric customers on policy (second day).

   Responsibility: D. Sliney

7. Notify Federal/State agencies of policies (3-5 days).

   Responsibility: Washington Office - W. Easley

8. a. P.R. release on policy (second day)
   b. P.R. prepare Q&A sheet on policy (third day)
   c. Series of paid advertisements (7-15 days)

   Responsibility: D.R. Bishop

9. Prepare form letters (third-fourth day).

   a. Transformer users
   b. Capacitor users

   Responsibility: D. Wood

10. Brief U.S. Export Managers on export policy (fifth day).

    Responsibility: C. Paton/D. Wood

11. Management/Marketing meetings with customers (second-third week).

    Responsibility: D. Wood

12. Notify U.S. export customers of policy (second week).

    Responsibility: Area Managers

13. Upon completion of final customer shipments, move all Monsanto PCB inventories to Krummrich incinerator.

    Responsibility: E.M. Potter

14. Initiate decontamination of Krummrich PCB facilities (see detailed decontamination plan):

    Responsibility: R.A. Pohl

DSW 185212

EMERGENCY PLAN - POLICY DECISIONS NEEDED FOR CAC APPROVAL

Domestic

1. Date of final production.

2. Shipment of inventory.

3. Customer commitment to orders on books but unshipped.

4. Incinerator returns (maximum rate 300,000 pounds per month).

   a. All returns invoiced a price to fully cover incineration cost.

   b. All customers given equal opportunity to use service.

   c. COP to be set up to handle.

   d. Alert other incinerator services of our policy.

5. No change in policy on refusal to ship transformer makeup requirements to transformer users. They should still obtain product from transformer manufacturer.

6. What assistance we will give on customer plant decontamination.

   a. Capacitor/Transformer manufacturers.

   b. End users -- will refer to equipment manufacturers (let our customers know we will do this).

7. Position on replacement fluid from Monsanto.

U.S. Export

1. Recommend cease shipments two months after we cease domestic shipments.

   a. Documentation/L of Credit/Import licenses involve longer lead time and possibility of legal liability if we shut off immediately.

   b. Additional flexibility in inventory run down.

Ex-U.S.A.

   a. Maintain U.K. production and take separate decision within one month of a U.S. ban.

   b. MESA should avoid commitment to long term supply contracts.

DSW 185213

Preliminary Actions

1. Persuade customers (capacitors) to buy and increase inventory of Aroclor/Capacitors/Inventories at users to give 4-6 months bridge.

   Responsibility: D. Wood (first contact by 2/15/76)

2. Persuade customers to accelerate MCS 1238 approval programs.

   Responsibility: D. Wood (contact by 2/15/76)

3. Confirm no continuing contractual obligations to supply.

   Responsibility: D. Wood (12/31/75)

4. Prepare survey of Askarel equipment used by Monsanto.

   Responsibility: G.L. Bratsch (request to GLB by 12/22/75)

5. List corporate sales to all dielectric customers.

   Responsibility: R.E. Hatton (12/31/75)

6. Prepare Tentative P.R. statement.

   Responsibility: D.R. Bishop (1/1/76)

7. List names of contacts to call at all customers.

   Responsibility: D. Wood (12/31/75)

8. Define detailed decontamination procedure for use at Krummrich and possible adaptation for customers.

   Responsibility: J.R. Savage (1/5/76)

9. Prepare recommendation on advice to customers re decontamination.

   Responsibility: D. Wood (2/1/76)

10. Develop list of publications for potential ad campaign.

    Responsibility: D.R. Bishop (12/19/75)

DSW 185214

PCB EMERGENCY PLAN - TELEPHONE LIST

	Office	Home
R.G. Potter	4-2142	469-1835
Manufacturing		
R.A. Pohl	4-2243	991-5455
A.E. Leisy	812-2019	966-5608
R.W. Flint	812-2043	849-0753
D.T. Mayer	812-310	618-286-3483
W.E. Voss	823-205-293	205-237-5834
Marketing		
C. Paton	4-2529	227-7581
D. Wood	4-2623	536-2161
Medical/Prdt. Acceptability		
J.C. Weber	4-2027	961-7693
Dr. G. Roush	4-2191	997-2234
W.B. Papageorge	4-2086	878-3513
Legal		
W.W. Withers	4-2851	227-8345
T. Bottini	4-2872	725-0677
Distribution		
E.M. Potter	4-2443	567-6043
C.B. Sigler	4-2428	618-234-9945
R.A. Sipes	4-2431	821-0938
Washington Office		
W.K. Easley	821-4548	301-299-9587
Public Relations		
D.R. Bishop	4-2891	469-1377

DSW 185215