Monsanto

FROM (NAME & LOCATION): D. Wood - B2SD

DATE: July 13, 1977

CC:

SUBJECT: PCB WASTES-INTERNATIONAL

REFERENCE:

TO: R. E. Beal
R. C. Isham
R. A. Stohr
E. T. Mollica
J. C. Weber

We have received isolated requests for assistance in PCB disposal from overseas. Such inquiries are likely to increase in numbers following the U.S. phase out of PCB's in capacitors and transformers. The major problem is that while high temperature (+2000°F) incineration is the preferred disposal method for liquid PCB's there are only a limited number of suitable incinerators in U.S.A. and Western Europe.

The attached recommendation suggests how Monsanto should respond to such requests in a consistent manner and not preclude a more direct involvement in a case where there could be a serious negative impact on our corporate position in a particular situation overseas.

I would appreciate your comments and suggestions on the attached recommendation before I take it forward for approval.

D. Wood

tmc

IN - 10 REV. 1/72

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D R A F T

PCB WASTES-INTERNATIONAL DISPOSAL-POLICY

SITUATION

Capacitor and transformer manufacturers and users of PCB containing equipment overseas will generate PCB wastes over the next 5-10 years. Many countries do not have incineration in place capable of destroying PCB's. We will receive requests to assist in disposal or to advise how the disposal should be appropriately handled. Our response to such inquiries could impact Monsanto's image in international areas.

RECOMMENDATION

1. Monsanto use a standard response to such requests to ensure consistency in our approach.
2. a) Explain that Monsanto incinerator was designed to primarily handle waste arising from our manufacture of PCB and was not equipped to process the broad range of wastes arising from the application of the product.

   b) Our incinerator will shut down in October 1977 and waste which could technically be handled could therefore not be accepted after July 1977.

   c) List commercial incinerators in U.S. and UK which have handled PCB's and Dutch incinerator ship.

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d) Attach extracts from EPA regulations relating to landfill of solid wastes and control of incinerator.

3. We should actively assist in disposal only if International Division at a level of _____-demonstrates a major corporate problem developing because of a specific PCB disposal problem.

4. In such a case we would try to establish disposal contract between overseas party and U.S. or UK disposal company on an arms length basis.

5. Encourage EPA to publish guidelines on incineration of chlorinated organic wastes including PCB's to give overseas countries better base to establish their own incineration capability.

ACTION REQUESTED

MIC and International agreement to this policy.

ALTERNATIVES CONSIDERED

1. Have wastes shipped (if proven to be of Monsanto origin) back to Newport UK or Sauget, Illinois. Monsanto then arrange shipment to outside incinerator or landfill.

Rejected because

a) After plant shut-down we will not have suitable storage areas to comply with PCB waste storage regulations or the skilled manpower familiar with PCB handling.

b) Monsanto will be involved with a continuing spill liability.

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c) It is not clear that State legislations will continue to permit PCB waste moving in interstate distribution let alone international movement into U.S.A.

D. Wood