J. A. Alley - B2SD

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Post-Withdrawal PCB Sampling

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1. Recommendation:

This is to recommend (on a conceptual basis) that we arrange with three laboratory supply houses to maintain a limited sample stock of PCB fluids. It is further recommended that we supply this material at no cost to the supply houses. Additionally, it is recommended that Monsanto advise EPA and FDA of our plan prior to contacting the lab supply houses.

2. Background

After Monsanto's withdrawal as a supplier of PCB's on October 31, 1977, requirements will likely continue several years for small quantities of material with which to conduct environmental experiment and research work. This work may be in the nature of environmental, toxicological and medical studies, and related areas. Thus, provisions should be made for a limited and controlled stock of the PCB fluids now available from Monsanto.

It would appear that making provisions for sample stock which could be used for future environmental research would be consistent with our social responsibility objectives.

The laboratory supply houses which would eventually maintain this sample stock should be prepared to:

a. Undertake control as to "where the material goes and who gets samples".

b. Certify that the sample stock won't get into the environment.

c. Commit to preserve the sample stock so it won't become contaminated over the years.

d. Repackage in glass or other appropriate containers so the material will remain in its original state.

e. Agree to provide samples only to organizations for environmental experiment and research purposes.

f. Commit to retain the sample stock for "X" years, i.e., 2 to 5 years.

g. Agree to alert users of samples to the nature of PCB's.

h. Commit to comply with prevailing federal and state regulations on labeling and transport.

Monsanto must follow the EPA and state regulations on labeling and transport through 1977 so that we can advise the laboratory supply houses on this subject.

Bill Hammann has recommended we make contacts with the following:

Aldrich
940 West St. Paul Avenue
Milwaukee, Wisconsin 63233
Phone: 414-273-3850

Sigma Chemical Company
3500 DeKalb
St. Louis, Mo.
Phone: 314-771-5765

Eastman Organic Chemicals
Rochester, New York

Additionally, the following organizations might be contacted about maintaining sample stock:

Analabs, Inc.
80 Republic Drive
North Haven, Connecticut 06473

Chem. Manufacture Company
1328 Burta Avenue
Salinas, California 93901

Attached is a table showing the number of sample requests and total pounds by product for the year 1976. Based on this information, I think it would be desireable to give

each lab supply house ten gallons of each product now manufactured by Monsanto, i.e., Aroclors 1016, 1242 and 1254.

3. Alternatives considered and reasons for rejection:

   a. Monsanto not make provisions for future sample stock-In view of the "environmental cloud" over PCB's and the many currently unanswered questions, it would be socially irresponsible for Monsanto to follow this course.

   b. Monsanto could retain sample stock in our research department or other location under a rigid control program. - This alternative tends to prolong Monsanto's involvement with PCB's. Resources, in terms of personnel and building space, would be required to carry-on such a program.

4. Action requested

Approval of this conceptual recommendation in order for contacts to be made and arrangments worked out with the lab supply houses. Comments on this recommendation are requested by February 4, 1977 from those receiving copies of this memo.

J. A. Alley

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