OUTSIDE PROCESSORS

Select companies for support of Monsanto operations — through product conversions, custom manufacture, formulating, packaging, by-product sales, and other services involving Monsanto products / technology — which will operate with concern for worker safety and protection of the environment.

PROGRAM

1. Assess capabilities of all processors to meet Monsanto and regulatory health, safety and environmental standards. Ensure that companies selected have all available relevant information on the Monsanto products and technology (including toxicological and environmental factors) with which they are involved.

2. Formalize all agreements by contract and include relevant available health, safety and environmental information on Monsanto products and technology.

3. Terminate arrangements with outside processors not meeting Monsanto guideline requirements.

4. All outside processors related to manufacturing operations and hazardous waste will have DEO approval, up-to-date assessments, with proper contracts by January 1, 1986.

5. All outside processors will have DEO approval, up-to-date assessments, and proper contracts by January 1, 1987.

STATUS/OBSERVATIONS

1. The definition of an outside processor was greatly expanded as a result of the 10/83 change to this guideline. Manufacturing-related activities were the primary focus of this guideline before 1983.

2. During 1984, a committee of operating company managers was formed to organize the outside processor program into a more uniform corporate activity. A clearer definition of outside processors was jointly developed and 25 different service codes (types) of processors are now listed. A standard corporate procedure is being developed for DEO approval. A computerized data base was initiated in 1984 to compile outside processor information for this guideline into a central system.

3. Our data base as of March 1985 shows:

— Listed Outside Processors	465	(24 categories)
— Assessments Completed	245	
— Re-audits Current	185	
— No Assessments	220	
— With Contracts	218	
— No Contracts	247	

4. The data base is expected to expand to over 650 outside processors when ex-U.S. companies and bulk truck cleaning companies have been added.

5. Significant resources will be needed to bring this guideline into full compliance across the corporation. It is estimated that more than 300 assessments and over 300 contracts will be needed in addition to maintaining the required re-audits at approximately 200 per year.

(Revised and Approved: Environmental Policy Committee, June 1985, as Worldwide Environmental Protection Guideline No. 5.)

DSW 117720

MONSANTO ENVIRONMENTAL POLICY STAFF

STLCOPCB4032257

5. No orders for products containing PCTs are accepted by COP.

Certified by R. C. Sprague

6. No orders for products containing PCBs are accepted by COP ; except for dielectric uses and heat transfer fluid to Goodyear Tire and Rubber Company.

Certified by R. C. Sprague

7. PCB heat transfer fluid orders for Goodyear Tire and Rubber Company will not be processed by COP after August 4, 1972.

Certified by R. C. Sprague

8. Orders for dielectric fluids containing PCBs are processed by COP only if approval is granted by H. S. Bergen.

Certified by R. C. Sprague

9. All acknowledgements of orders from approved PCB customers include a copy of a letter by H. S. Bergen stating the material contains PCBs and must be handled, used and disposed properly.

Certified by R. C. Sprague

10. None of the products sold by the Specialty Products Group are made with PCBs or PCTs as a raw material or ingredient, or are manufactured in equipment which uses PCBs or PCTs as an industrial fluid with the following exceptions:

a. Fluids sold to approved customers for dielectric applications

b. The special hydraulic fluid sold to the German mines

c. PCB heat transfer fluid sold to Goodyear Tire and Rubber Company

d. A heat transfer system located at the J. F. Queeny plant used in the processing of some of our products still contains PCBs. No makeup is being supplied to the system. Each lot of product produced is analyzed to assure no detectable PCB content. A conversion to a non-PCB fluid is scheduled for August, 1972.

Certified by J. R. Savage

DSW 127920

SERVICE CODE TABLE
DEFINITION OF OUTSIDE PROCESSORS & WORLDWIDE GUIDELINE NO. 5

DEFINITION OF OUTSIDE PROCESSORS	FOLLOWUP ASSESSMENT FREQUENCY, YRS	CONTRACTOR SERVICE CODE
**By-Product/Co-Product Sales Contracts*	2	01
**Contracts With Manufacturers*		
Conversions	2	02
Processing	2	03
Blending	2	04
Formulating	2	05
Material Recovery/Reclaiming	2	06
Material Purification	2	07
**Contracts For Materials Handling*		
Packaging or Repacking	3	08
Bulk Terminals	3	09
Transloading Operations	3	10
Waste Haulers (Incl. Waste Oil)	2	11
Fulfillment Houses	4	12
Packaged Goods Warehouse	3	24
**Contracts Involving Vessel Cleaning*		
Bulk Trucking Cleaning Companies	Not Defined	13
Tank Car Cleaning	2	14
Barge Cleaning	2	15
Vessel and Equipment Cleaning (Usually In-Plant)	3	16
Drum Cleaning	2	17
Drum Reclaiming	2	18
**Contracts Involving Disposal*		
Hazardous Wastes	2	19
Sanitary Wastes	3	20
Scrap	4	21
Waste Oil Disposers	2	22
Waste Oil Reclaimers	2	23
Laundry	4	25

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