Monsanto

FROM (NAME & LOCATION) B2SH Cumming Paton

DATE October 14, 1971

SUBJECT Status of PCBs

REFERENCE

TO : 1070 H. R. FORD
1010 R. A. GARCIA
1800 D. R. HANSEN
1650 P. L. SLAYTON

cc B2SL T. L. Gossage
B2NK W. B. Papageorge
B2SJ N. T. Johnson
W4A P. S. Park
B2SH P. G. Benignus
B2SH D. E. Roush/J. J. Roder
B2SH D. R. Pogue

CONFIDENTIAL

The following are the notes I used in the PCB "presentation" that must have held you enthralled at midnight after a 17-hour day!

Dielectrics

1. Product Changes

CONFIDENTIAL:
(a) Aroclor 1242 for capacitors changed to more biodegradable 1016. — U.S./CANADA ONLY SO FAR. EX-U.S.A SITUATION UNDER STUDY.
(b) Aroclor 1221 renamed Capacitor 21.
(c) In transformers no major changes planned.
(d) Research under way on PCB replacements. (Don't expect results in under 3-5 years.)— CONFIDENTIAL.

2. Customers (DOMESTIC)

We've located about 4 plastics users trying to get dielectric grade in the first 2 weeks!
(a) Effective October 4, dielectric fluids must be approved prior to order entry by P. G. Benignus or C. Paton and W. B. Papageorge or T. L. Gossage.
(b) To prevent the need to approve all orders, a list of approved customers in both capacitors and transformers has been compiled and will be circulated by October 18.
(c) Field sales should scrutinize MIP runs re customers and order size. Follow up on doubtful ones and alert Product Group and COP.
(d) Regional managers to add one line to their monthly report:

Unapproved Fluid Sales: (No or Yes)
If yes, a separate report should be sent on this.

Customer Notification (DOMESTIC)

A letter on the pollution aspects of PCBs will be sent to customers. This is being cleared with the Legal Department.

ANSI

An S.I.B. has been written on the formation of Committee C107

MONS 100055

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of ANSI. This committee will address itself to the problems PCBs pose for the dielectric industry.

Pollution Control

We are addressing ourselves to the pollution control or lack of it related to "service centers" for transformers or transformer users who buy only replacement fluid from Monsanto.

Heat Transfer Fluids

1. Conversions

Conversion of direct food-related users: completed.	
Conversion of curtain coaters (~ 80% complete).	
Conversion of film and foil producers	D. E. Roush preparing list of target accounts for conversion.
Conversion of adhesive manufacturers	
Conversion of resin manufacturers for paints and coatings.	

2. Restrictions

No FR fluid sales for new applications will be strictly enforced. This will include hospitals and off-shore gas platforms.

3. Customers (Domestic)

(a) All orders are being approved by two people prior to order entry.
(b) A list of approved FR users (top-up only) is being prepared and will be circulated by October 25.
(c) Field sales scrutiny of MIP runs is requested (as per dielectrics).
(d) Regional managers should report on unapproved fluid sales (as per dielectrics).
(e) We still need field sales help in completing surveys on the applications of FR customers.

4. Customer Notification

A mailing to all customers is planned. This will include: warning on PCBs; alternates to FR; non-fire retardance of T-55, 56 and 77; conversion offer and procedure; positive approach to non-FR fluids; tighter maintenance guide for all fluids.

5. Labels

New labels are being printed. This will include a stronger statement on food and food-related uses. It will also

cover the return of used fluid for incineration.

Process Fluids

1. Carbonless Carbon Paper

   No sales of chlorinated bi- or terphenyls.

2. Dye Carriers

   Aroclor 1221 replaced by Aroclor 1221B. (Aroclor 1221B is monochlorobiphenyl whereas Aroclor 1221 did contain up to 25% PCB. We should make no big issue out of this with any customer. Currently Ciba-Geigy is the only customer affected and this has been handled. Therefore any request for Aroclor 1221 will be filled with ~~Aroclor Carrier 1109 1221B~~ Aroclor 1221B without comment.) [Geigy will be sold Carrier 1109 if needed]

3. No customer notification of Process Fluids is planned as a general mailing. Individual customer situations have been and will be handled separately.

In addition to the above, the following situations have arisen.

1. Requests by paper companies for information, help on PCBs in recycled paper. We should refer companies to The American Paper Institute which is active in this area

   or to W. B. Papageorge.

If any paper company wants methods for detecting PCB, Bill has a "Methodology Packet" that can be sent.

2. Requests from Monsanto customers that we write letters stating whether or not the products supplied by any of our Divisions are PCB-free.

   Specialty Product Group products: All products (except dielectric Aroclor/Inerteen/Pyranol; Aroclor 5400 and 6000 series; Aroclor 1221B; Santovac 1 and 2; Pydrauls; Therminol FR series; and Turbinol 153) the regional manager should write the customer assuring him of the absence of PCBs.

   On product exceptions -- contact W. B. Papageorge.

   Products from other groups: Pass request to your counterpart in the region for handling.

3. Pollution Control Procedures for Customers' Plants

   A draft of a bulletin on this subject has been written and is being revised.

I have been impressed by the efforts many of your men have put into turning this difficult situation around. If they have any suggestions where we can improve on our procedures and policies or problems we are ignoring we'll be only glad to hear from them. If they need specific help from anyone in St. Louis please let us know. I'll try to keep you as up to date as I can on future developments.

Cumming Paton

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