Monsanto

FROM (NAME & LOCATION) G. R. Sido - G5EC

DATE : February 15, 1972

SUBJECT : LABELING BULK PCB SHIPMENTS

REFERENCE :

TO : B2NK -
MR. W. B. PAPAGEORGE

cc: MESSRS:
B2SL - H. S. BERGEN
B2SL - W. R. COREY
B2SL - T. L. GOSSAGE
B2NK - E. M. POTTER
B2SL - J. R. SAVAGE
B2NA - C. B. SIGLER
B2SA - J. F. STAPLETON

Your memo expresses desire to:

1. Deliver complete product and precautionary information with every tank car and tank truck shipment.

2. Alert carrier personnel and emergency crews about environmental contamination from leaks or spills.

3. To contact the Krummrich Plant in the event of such accident.

Where laws or regulations govern labeling of dangerous articles, they do not exempt tank cars or bulk loads. They specify the same product information, hazards, precautions, et cetera, as for drums accompany the load! Polychlorinated biphenyls are not subject to existing regulation. Attaching a product label to every tank car and tank truck will provide product identification and the complete message of precaution and prevention of environmental contamination as well as waste disposal. In the case of truck shipments, the label could be attached to the bill of lading carried by the driver. A strong plastic envelope with a metal gromet can be attached to the car seal and the envelope will hold and protect a product label. This system has been used successfully by Carbide for many years and we have used it on occasion.

It is the carrier's responsibility to notify the shipper in the event of spills or leaks that require corrective action to equipment or result in inability to deliver a shipment. Billboarding the entire environmental protection message might just alarm the general public without likely benefit. You might consider limiting the message to, "In Case of Leak or Spill, Call Collect 618-271-5835."

If any label message is to accompany bulk loads, I recommend it be the entire label text for the product.

G. R. Sido

/mw

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