W. B. Papageorge - B2NA

July 31, 1972

Mr. W. R. Corey
B2SL

H. S. Bergen - B2SL
G. L. Bratsch - 1740
W. S. Clark - B3NC
D. Goodwillie - 5090
T. L. Gossage - B2SL
E. Greene - A2NA
G. L. Jessee - 1060
P. J. A. Marsh - 5040
E. M. Potter - B2NK
J. R. Savage - B2SL
R. C. Sprague - B2NO
J. F. Stapleton - B2SA

Attached is a summary of the current status of each of the actions listed in the PCB/PCT Implementation Program described in your memo dated December 27, 1971 to C. P. Cunningham. Certification by the appropriate managers is shown. You will note that with the termination of PCB sales to Goodyear Tire and Rubber Company and to the German mine industry, the program will be completed in its entirety.

To assure continuing control, the following actions have also been certified:

1. All unsold worldwide inventories of Monsanto products containing PCBs and PCTs are well inhhand. Each location has been advised of disposition of remaining inventory to avoid any environmental or other contamination.

   Certified by E. M. Potter
   E. Greene

2. No shipments of monochlorobiphenyl (Aroclor 1221B) or PCTs will be made from Anniston plant except for disposal purposes.

   Certified by G. L. Jessee

3. No samples of PCBs or PCTs will be released from the W. G. Krummrich or Anniston plants without approval from W. B. Papageorge.

   Certified by G. L. Jessee

   Certification pending from G. L. Bratsch

4. No products containing PCBs are shipped from the W. G. Krummrich plant without proper release from COP.

   Certification pending from G. L. Bratsch

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

As of July 21, 1972 the U.S. Therminol FR convereion program has resulted in 138 conversions in 1972. With the decrease in activity the conversion team has been gradually reduced down to one engineer who is arranging for another and probably final conversion recommendation to the remaining 200 plus customers with PCB heat transfer systems.

Our survey of 130 known customers of heat transfer units in food related systems resulted in 93 conversion confirmations. Additional information available to us indicates that 28 of the remaining 37 have converted to non-PCB fluids. An attempt will be made to recontact these 28 to confirm their conversion status and of the remaining 9 to establish their status. A summary report of the total conversion effort is planned for late August.

W. B. Papageorge

/bt

MONS 099783