#5

OUTSIDE PROCESSORS

Select companies for support of Monsanto operations — through product conversions, custom manufacture, formulating, by-product sales, waste management, and other services supporting Monsanto businesses — which will operate with concern for worker safety, regulatory compliance, community protection and protection of the environment.

PROGRAM

1. Monsanto will utilize only outside processors which have been selected and periodically assessed to assure:
   (a) Their ability to adequately protect the public, employees and environment from any effect of Monsanto chemicals, products or wastes.
   (b) Their compliance with all applicable laws and regulations.
   (c) Their knowledge of potential hazards and any applicable manufacturing requirements associated with Monsanto materials handled.
   (d) Their use of approved waste disposal methods and locations, with recordkeeping of all material use and waste disposal.
2. Selections and assessments shall be documented and approved by the Operating Unit Director of Environmental Operations and an appropriate contractural arrangement shall be established with each firm prior to startup of operations.
3. Outside "processors" include firms which provide services related to Monsanto chemicals, products or wastes. "Primary" firms will receive an on-site assessment, management approval, and a written contract.

   Secondary firms should be assessed and be subject to approval and contracts when high hazard materials or Class B poisons are involved, or whenever the situation involves a significant risk.

   Primary services include:

Conversions	Tank Car Cleaning[1]
Processing	Barge Cleaning[1]
Blending	Drum Cleaning/Reclaiming[1]
Formulations	Waste Material Sales
Material Recovery/ Reclaiming	Waste Hauling (including oil)
Material Purification	Hazardous Waste Disposal
Packing or Repacking	Waste Oil Disposal
Bulk Truck Cleaning[1]	Waste Oil Reclaiming
	Transformer Retrofill

[1]Applicable to hazardous products or Monsanto owned or leased vehicles.

   Secondary services include:

   Bulk Terminals
   Transloading
   Fulfillment Houses
   Packaged Goods Warehousing
   Non-hazardous Waste Disposal
   Vessel and Equipment Cleaning

   Excepted are services performed by established major chemical firms (approved by the Unit Director of Environmental Operations), publicly owned treatment works, sales of wastes which are equivalent to virgin chemicals in commerce and transformer retrofill where wastes are retained under Monsanto control.
4. Assessments are to be performed prior to initial use and at a frequency recommended in the prior assessment (normally one to three years).
5. MCC Environmental Engineering maintains a corporate-wide database of all outside processors to avoid redundant assessments and contracts and to facilitate use of approved contractors.
6. The above program elements will be implemented at ex-U.S. locations, but with modifications as necessary to reflect local limitations, restraints to compliance, and the extent of Monsanto's operating control. Status and direction of the local program will be reviewed in planned environmental audits of these facilities.

(Reviewed and Approved without change by Environmental Safety & Health Committee April 25, 1989.)

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