PLAINTIFF'S EXHIBIT
MON-1637

Monsanto

FROM (NAME & LOCATION) J. A. Stal - Texas City - OA-11

DATE October 30, 1984

SUBJECT Proposed Pipeline Policy

REFERENCE

TO G. T. Ryan-O-5

- E. P. Bailey-2Z
R. T. Hammann-O-22
S. W. Moncla-513D
J. T. Payne-SS-18
J. D. Richards-1Z

SHAC has surveyed the plant for comments on the proposed "Policy for Ownership of Ex-Battery Limits Pipelines and Systems". As a result of this survey, SHAC recommends the following modifications:

1. Change in ownership of a pipeline should be at a valve instead of at a flange. This would cause less confusion and would give the unit total control when decontaminating a pipeline.

2. This valve should be painted a special color such as florescent purple, to eliminate any confusion about where ownership changes.

3. Each department should establish a "master list" defining the ownership limits of their multi-use pipelines. All of the users should be involved in determining where ownership changes.

4. Exclusive use of pipelines should mean exclusive ownership, i.e. pipelines from docks to storage tanks should belong to distribution. Maintenance costs could still flow to the product line involved. This rule would minimize the chances of another "styrene incident".

J. A. Stal

mhd

D R A F T

POLICY FOR OWNERSHIP OF EX BATTERY LIMITS PIPELINE AND SYSTEMS

The owner of "ex-battery limits" pipelines and systems is defined as the supervision of the operating department that (1) produces the material flowing in the pipeline and/or (2) uses the material flowing in the pipeline that has been unloaded from tank truck, tank car or marine dock distribution facilities.

In the case of multiple users of raw materials, one operating area is normally designated as owner having responsibility for "ex-battery limits" pipelines and systems. For example, there are several users of caustic soda, sulfuric acid, chlorine, etc.; however, the HCN Complex Area has been designated as the owner for these multiple user raw material pipelines and systems.

One area requiring further clarification in applying the above policy occurs at the interface of operating units and materials handling/distribution facilities. It should be understood that tank truck and tank car racks and marine docks are considered as having individual "battery limits" and are the responsibility of the Distribution Department. However, pipelines to storage tanks from material handling facilities become the operating department's (owner's) responsibility beyond the last flange on the rack or dock and pipelines from storage tanks to distribution facilities remain the operating department's (owner's) responsibility to the first flange on the rack or dock.