Monsanto

FROM (NAME & LOCATION) G. L. Johnson - Krummrich

DATE March 25, 1974

SUBJECT Returned PCB Drums

REFERENCE

TO : A. E. Leisy

cc P. G. Benignus - B2SC
W. C. Engman
P. E. Heisler
H. G. Rayfield
J. R. Savage - B2SL
B. R. Williams

I am in the process of developing a program to insure proper handling of returned waste Aroclor for incineration at the W.G.K. facilities. Thus far, I recommend the following actions:

1) Inspect Returned Drum Shipments.

Spent Aroclor in drums should be inspected at the plant gate. Any indication of "leakers", spills, excessive drippings, etc, which could result in material reaching the environment will not be accepted. When possible, violations should be reviewed by WGK environmental personnel. Any returned drum shipments in the same truck load with food, animal feed stuffs, or pharmaceuticals should also be noted and brought to the attention of the environmental group and the transit company.

2) Improve The Labeling On Returned Drums.

At present, the only label on most returned drums does not adequately warn of PCB's hazards, who to contact in event of leaks or spills, storage limitations, etc. (Label "A", 1068/53, attached). Therefore, in addition to this label, I recommend returned drums also display a warning similar to the "seven language logo" that now appears on all Aroclor drums originating from the plant. (Label "B", 1249/53, attached). This should aid handling problems in transit.

Responsibility: Marketing
Timing : 7/1/74

3) Inform The Customer.

Contact the customers, impressing upon them the need to use adequate drums for returning scrap Aroclor and to utilize the proper labeling.

Responsibility: Field Sales
Timing : 7/1/74

Any comments, additions, deletions?

DSW 353109

Gary

Gary L. Johnson

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