Monsanto

FROM (NAME & LOCATION) W. B. Papageorge - B2NA

DATE : July 31, 1972

SUBJECT

REFERENCE

TO : Mr. W. R. Corey
B2SL

cc: 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 - B2NG
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 in hand. 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

DSW 330214

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

DSW 330215

As of July 21, 1972 the U.S. Therminol FR conversion 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

DSW 330216

STATUS REPORT

PCB/PCT IMPLEMENTATION PROGRAM

U.S. DOMESTIC PROGRAM

I. Discontinue sales of PCBs for heat transfer applications

The sales of PCB heat transfer fluids in the U.S. were terminated on December 15, 1971 with two exceptions, both covered with hold harmless agreements. We continue to supply Goodyear Tire and Rubber Company under an agreement until August 7, 1972. We supplied fluid to Bendix Corporation under an agreement but sales were terminated prior to June 1972.

Certified by T. L. Gossage

II. Further sale and delivery of PCBs as dielectric fluids for transformers and capacitors will be made in conformance with certain restrictive policies adopted by Monsanto management.

Sales of PCB dielectric fluids in the U.S. were terminated on January 15, 1972 except to approved customers who satisfy Monsanto's special requirements.

Certified by T. L. Gossage

III. Discontinue all sales of PCTs (polychlorinated terphenyls) no later than June 30, 1972. The program calls for 75% of such sales to be terminated by March 31, 1972, with the remainder to be terminated during the second quarter of 1972.

With two exceptions, sales of plasticizers containing PCTs were terminated on March 31, 1972, exclusive of a few customers who had signed hold harmless agreements. The two exceptions occurred in early April, Sales to customers who had signed hold harmless agreements were terminated prior to June 30, 1972.

Certified by W. S. Clark

Sales of PCT industrial fluids were terminated on June 30, 1972.

Certified by T. L. Gossage

DSW 330217

U.S. EXPORT PROGRAM

I. Discontinue all sales of PCBs for all uses other than as dielectric fluids in transformers and capacitors no later than January 31, 1972. Effective date of discontinuance shall be date of letter giving formal notification.

Sales of PCBs for all uses other than dielectric fluids in transformers and capacitors were terminated by January 31, 1972.

Certified by E. Greene
D. Goodwillie
W. S. Clark

II. Further sale and delivery of PCBs as dielectric fluids for transformers and capacitors will be made in conformance with the restrictive policies adopted by Monsanto management.

In Canada sales of PCBs to dielectric applications were terminated on January 31, 1972 except to approved customers who satisfy Monsanto's special requirements.

Certified by D. Goodwillie

Remaining export sales of PCB dielectric fluids were terminated on March 31, 1972 except to approved customers who satisfy Monsanto's special requirements.

Certified by E. Greene

III. Discontinue all sales of PCTs no later than June 30, 1972. The program calls for 75% of such sales to be terminated by March 31, 1972 with the remainder to be terminated during the second quarter of 1972.

All sales of plasticizers containing PCTs were terminated on March 31, 1972 except for those customers who signed special agreements. These were terminated by June 30, 1972.

Certified by W. S. Clark
P. J. Marsh
D. Goodwillie
E. Greene

Sales of industrial fluids containing PCTs were terminated on June 30, 1972.

Certified by D. Goodwillie
P. J. Marsh
E. Greene

DSW 330218

MONSANTO EUROPE PROGRAM

I. Discontinue all sales of PCBs for other than dielectric uses by January 31, 1972.

Sales of all PCB products other than hydraulic fluids for the German mining industry and dielectric fluids were terminated on January 31, 1972. Program calls for termination of sales to the German mines by November 30, 1972.

Certified by P. J. Marsh

II. Further sales and delivery of PCBs for dielectric uses for transformers and capacitors will be subject to the same restrictive policies adopted for U.S. domestic and U.S. export sales and the effective date of implementation will be March 31, 1972.

Sales of PCB dielectric fluids were terminated on March 31, 1972 except to approved customers who satisfy Monsanto's special requirements and to Eastern European customers to whom we continue to sell ~~without restrictions~~.

Certified by P. J. Marsh

MMK PROGRAM

Mitsubishi Monsanto discontinued the exporting of PCBs except for dielectric purposes on January 31, 1972. Manufacture of PCBs was discontinued entirely on March 17, 1972 and all sales were discontinued shortly thereafter.

Certified by E. Greene

DSW 330219