Monsanto

FROM (NAME & DEPARTMENT) J. G. Bryant - St. Louis

DATE April 11, 1969 CC

SUBJECT SCRAP AROCLOR DISPOSAL PLAN

REFERENCE

TO

P. G. Benignus - PBENI
D. A. Olson - DOLSO
N. T. Johnson - NJOHN
R. Garcia - AKRON
R. Sullivan - WILMINGTON
L. Bradford - LOS ANGELES
G. R. Graham - NEW YORK
J. Davidson - LOS ANGELES
R. Damiani - CHICAGO
R. Hamil - ATLANTA
R. Meyer - RMEYE
R. Vogler - AKRON
G. Fague - DETROIT
C. Clay- CCLAY
R. H. Munch - QUEENY
R. M. Kountz - RKOUN
W. A. Kuhn - WKUHN
W. R. Richard - WRICH
~~A. J. Koenig - AKOEN~~
J. H. Rositz - JROSI

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DEPOSITION EXHIBIT 169

PLAINTIFF'S EXHIBIT 1634

PLAINTIFF'S EXHIBIT 783

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SCRAP AROCLOR DISPOSAL PLAN

In the past, scrap Aroclor (becoming better known today as polychlorinated biphenyl - PCB) has been used for various-sundry uses from settling dust to killing weeds. It has even been used to exterminate around houses. In general, Aroclor has not been considered a noxious chemical and in the past has been and is presently being dumped indiscriminately in ponds, streams, and land fill dumps. Also, with the advent of additives such as P-2 many capacitor manufacturers started producing additional scrap material. Consequently, there became an increasing need for these people to dispose of this waste.

With the publication of "Polychlorinated Biphenyl in the Global Ecosystem," relating to the harmful effects of PCB pollution, and the general public interest in polychlorinated biphenyl contamination in our environment, Monsanto being the only producer of chlorinated biphenyl in the United States feels its obligation to assist its customers in the disposal of scrap Aroclor. Perhaps the original objective was economic as well as for pollution abatement. However, today while we still are interested in the economics, the primary concern is pollution abatement.

The program was originally started with General Electric at Hudson Falls, New York, who had accumulated a sizable quantity of scrap Aroclor of which they needed to dispose. We checked drums of this material which varied from acceptable to completely unacceptable. One tank shipment was successfully refined to be reused in a non-electrical application. Incidentally, the tank car did process very economically. Findett Services in St. Charles, Missouri, were contracted to process the material for Monsanto. Then a program was established with General Electric whereby they police the quality of the scrap to collect the "good" and "bad" material separately. Because of the large quantities involved, G.E. set up a tank car for handling the scrap collected. They will ship to us in 9000-gallon lots. The bulk shipments conserve labor and reduce the sampling considerably when compared with receiving material in 55-gallon drums.

Our dealings with General Electric have more or less established the general policy we are trying to apply to all customers. To arrive at a mutually acceptable program, we have adopted the following:

POLICY: 1) One cent per pound credit on the amount of reclaimed Aroclor which can be reused by Monsanto. The decision on whether or not the reclaimed Aroclor can be used rests with Monsanto.

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2) Monsanto will pay the freight charges to Findett Service Co., St. Charles, Missouri, when the material is shipped via tank car or truck load lots.

3) When shipment cannot be made in bulk via tank car or truck and must be made in 55-gallon drums, Monsanto will allow a maximum drum credit of $1.25 per drum.

In order to make this policy workable, the scrap must be policed in the factory of the sender to eliminate the "junk". If the material is collected in used drums, one must be sure that residual material in the drums from previous shipments does not grossly contaminate the Aroclor. Also, each customer should be set up with an Agreement Number, similar to General Electric.

PRESENT SITUATION:

Presently Findett Services has 135 drums from General Electric, Hudson Falls, N. Y. Of these, 65 drums have been isolated as junk. The other 70 (which were received in the last couple of weeks) must be sampled individually to see if they can be recovered. There are 84 drums from Westinghouse, of which about 50% of the first shipment of 38 drums is usable. The most recent 47 drums must be sampled similarly to the G.E. material to determine if it can reclaimed. Findett is in process of setting a tank to collect this material, presently.

G.E. has a tank car which they use to collect the "good" scrap and ship in bulk. Milt Tegethoff of Findett Services visited Westinghouse at Bloomington on 4-10-69 to set up some type of policing policy for quality control. Hopefully in the future Westinghouse will be in the position to ship in bulk. Dick Hamil is working with Sangamo Electric in Pickens, South Carolina, to establish their scrap volume.

HANDLING PROCEDURE:

As spelled out in the policy, Monsanto will pay the freight and allow $1.25 credit per drum for drum shipments. The 1¢/lb. is subject to interpretation and most likely will result in confusion. To expedite this procedure and insure that the customer receives prompt credit, we must adopt the following handling procedures:

1) All freight bills should be sent to Joe H. Rositz at Monsanto, St. Louis, with reference to an Agreement Number (which can be obtained from Joe); e.g., for General Electric, it would be Agreement 171.

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2) Once the drums are received at Findett Services, a Received report will be sent to Joe Rositz for the drum allowance to the customer.

3) Once Findett Services recovers the material, then and then only will the 1¢/lb. be allowed to the concerned customer.

SPECIFIC FUTURE ACTION NEEDED:

1. R. Graham/R. Sullivan: (a) continue trying to get Larry Barker at G.E., Hudson Falls, to collect good scrap in the tank car; (b) continue to work with other capacitor manufacturers and establish their waste disposal techniques.

2. R. Meyer/R. Garcia: (a) continue to work with Westinghouse Electric, Bloomington, Indiana, to work out a satisfactory shipment system - bulk or drums; (b) continue to work with P. R. Mallory to determine their waste situation.

3. R. Hamil/R. Sullivan: Investigate and establish some quantity figures for Sangamo Electric Co. in Pickens, South Carolina. Work out satisfactory program with Sangamo.

4. R. Damiani/R. Garcia: (a) See if you can establish some numbers on McGraw Edison line material on their waste which they are presently sending to a dump. According to the other capacitor manufacturers' process, McGraw Edison could have more waste than they realize. (b) Determine waste disposal at E.U.C. in LaSalle, Illinois.

5. Joe H. Rositz: Handle freight and drum allowance as notices come in. Findett Services will notify you on the 1¢/lb. credit.

6. J. Davidson/L. Bradford: Thanks for your survey on the West Coast. You may like to consider accumulating the waste in that area until you get a truck load. As I recall, Federal Pacific Electric in Milpitas, Calif., has about 400 gallons/yr., which is the largest disposal.

7. W. R. Richard/R.M.Kountz/M. Tegethoff, J. Bryant: Review disposal and determine a course of action for "bad" material as well as the "good" material.

8. All: Please keep me advised on all shipments to Findett Services.

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Hopefully this outlines our Scrap Aroclor Disposal Plan. We certainly need the input of all to handle this very serious problem. We welcome any comments any of you have regarding the entire waste disposal.

We appreciate the efforts of everyone in the past and look forward to some type of report, especially from those outlined under "Specific Future Action".

Regards,

JB:rah

Jim Bryant

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