re M. Walker

Monsanto

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 694-1000

December 5, 1975

Mr. C. A. Garland
Assistant Director -
Field Operations
Bureau of Explosives
1920 L Street, N.W.
Washington, D.C. 20036

Dear Mr. Garland:

Recently Dave Williams, your District 7 Inspector, asked about the handling given to PCB's or Polychlorinated Biphenyls and indicated you also had the same interest.

Let me pass along some of the detail concerning the shipment of PCB's. First of all the product line does not fall under any of the hazardous material definition under Title 49 Parts 170-179, Code of Federal Regulations. However, we believe certain precautionary statements should be made as evidenced by the following procedure. On the bill of lading we stamp the statement,

"IMPORTANT"

"This product contains POLYCHLORINATED BIPHENYLS (PCB's) which some studies have shown may be persistent, and environmental contaminant and possibly injurious to certain forms of bird, aquatic and animal life. Prevent any entry into the environment through spills, leakage, disposal, vaporization, reuse of containers or otherwise. Spills, leakages and waste product must be collected.

"During shipment avoid spills and leakage into inland waterways and sea.

"Keep away from food, animal feed stuffs and pharmaceuticals."

On the container, if it is a drum, we attach a label such as the label I have enclosed marked "A." If the shipment is in a tank car, we make a bulk load tag according to the instructions shown on the enclosed labeling bulletin marked "B" and attach it to the car seal and/or discharge outlet. On the tank car we also place a marking label enclosed as "C" that we place on the tank car in four places, see enclosure marked "D." You will note that the label begins with "In case of leak or spill, call collect 618 271-5835."

The W. G. Krummrich plant, Sauget, Illinois, is the production plant you get when you call the above number and their personnel are trained in handling any incident involving PCB's. I hope the above information helps you to better understand the shipping precautions being used on PCB's and if we can be of further assistance, please give us a call.

Very truly yours

W. R. Schaffer
Manager Transportation Planning

/mw

CC:
Mr. D. B. Williams
Inspector
Apartment E
321 Barrington Square
Kirkwood, Missouri 63122