FROM (NAME & LOCATION): E. Greene - St. Louis

March 30, 1972

SUBJECT: PCB DIELECTRIC SALES

REFERENCE:

TO: J. P. Berndt-St. Louis
P. A. Klingsporn-St. Louis
A. D. Lapthorne-Melbourne
P. J. A. Marsh-Brussels

W. R. Corey-St. Louis
J. Culver-Hong Kong
J. R. Durland-Tokyo
R. F. Garnsworthy/K. Witcome-Melbourne
T. L. Gossage-St. Louis
R. S. Hill-Taipei
T. Ishijima-Tokyo
S. P. Karlow-Washington, D. C.
R. K. Louis-Manila
C. Paton-St. Louis
G. W. Sperberg/G. E. White
J. E. Tucker/F. Camargo

Further to the memo Howard Bergen and I sent you on March 8, we have some additional advice on the handling of PCB sales to dielectric customers.

1. I am enclosing the "handling instructions" referred to as Item 4 in the proposed letter to dielectric customers. It is the warning notice we are asking them to acknowledge that they have received. You recall we asked you in our March 8 memo, to have this letter cleared with your local legal counsel.

2. We would also like to have you discuss with him our responsibility for advising users of PCB-containing transformers and capacitors. In the letter referred to in paragraph 1, could we, for example, include a fifth condition that the manufacturer agrees to notify his customers of the hazards of PCB's? We are working on a small decal or plaque for transformers, warning that the unit contains PCB's.

3. As indicated in our previous memo, MESA is installing the same procedures for handling U.K. exports as we are for U.S. exports. If you have occasion to order U.K. material, send copies of the customer's acknowledgement letters to D. G. Millman and A. Arpino in Brussels. (For U.S. exports, you recall, we asked you to send copies to Messrs. Hayden and Paton.)

4. You will want to discuss with your transformer customers how best to handle inquiries from their customers for "topping up" material. From our point of view, the best way of handling these orders is through the original manufacturers. Where large quantities are involved or

supplying customers in third countries, we would consider handling on a drop shipment basis, i.e., we accept an order from the transformer manufacturer for shipment to a third party. Credit and legal liability remains with the transformer manufacturer.

5. In the case of Europe, we are considering sales through a few selected independent agents but only on the same conditions as sales through Monsanto sales offices, i.e., we will require that the agent obtain an acknowledgement letter from his customer and that he files copies with us. Let us know if you have customers in any countries covered by independent agents whom you would like to have handled in this way. We want to keep the number of such cases to a minimum.

6. Repeating our earlier memo, we want to keep sales from local stocks to a minimum. Any such sales that are made require the same approvals, i.e., by Paton, Gossage or Corey in St. Louis or Arpino in Brussels. We must also ask that you send Arpino and Paton monthly reports of sales from local stocks, showing the customer, product and amount sold.

7. We are taking care of notifying local carriers in U.S., Canada, U.K. and Europe of the hazards involved in handling PCB's. Stu Morrison will handle similar notification of ocean carriers. We must ask you to handle the notification of local inland carriers in any countries in which you plan to sell PCB's. Please keep us informed.

I am sorry to burden you with this additional work, but I think once we get the original arrangements in order, sales should flow smoothly. Let us know if we can help.

Edmund Greene

P.S. Incidentally, John Durland has information that Kanagafuchi will discontinue manufacture July 1. This should make our position sound most reasonable. What reaction are you getting from marketplace?

POLYCHLORINATED BIPHENYLS

WARNING -- Some studies have shown that polychlorinated biphenyls may be persistent, an environmental contaminant and possibly injurious to certain form of bird, aquatic and animal life.

Use of this product must be restricted to applications which can be controlled so that entry into the environment does not occur and for applications in which it cannot come into contact with food, animal feedstuffs or pharmaceuticals.

Extreme care should be taken to prevent any spills, leakage, disposal vaporization or otherwise. When such accidents occur, the product must be collected and not allowed to enter the environment.

PRECAUTIONS - HARMFUL SUBSTANCE if taken internally or if in prolonged contact with the skin CAUSES IRRITATION of skin and eyes.

Keep container properly closed.
Store away from food and drink.
Do not eat or smoke when using.
Avoid breathing vapours, mists or fumes.
Avoid contact with eyes or prolonged contact with skin.
Do not reuse contaminated clothing.
Wash product from skin with soap and water.
Wash eyes by flushing with water.