DRAFT March 28, 1972

DRAFT.

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C. Paton
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J. E. Tucker/F. Camargo

Subject: PCB DIELECTRIC SALES

Bill
For your comments, especially on moving attachment
E.E.

To: J. P. Berndt
P. A. Klingsporn
A. D. Lapthorne
P. J. A. Marsh

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, asking them to acknowledge that they have been adequately warned. You recall we asked you ~~on~~ in our March 8 memo to have this letter cleared with your local 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 ~~further~~ fifth condition that the manufacturer agreed to notify his customers of the hazards of PCB's. We are working on a small decal or plaque for transformers ~~notifying end users~~ warning that the unit ~~product~~ contains PCB's.

3. As indicated in our previous memo, MESA is ~~handling~~ to 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.

4. You will want to discuss with your transformer customers how best to handling inquiries from their customers for "topping up" material. The ~~only practical~~ way of handling these orders is through these 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 and that he file 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.

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

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.