

**Monsanto**

FROM (NAME & LOCATION): **E. M. Potter - General Offices - B2NK**

DATE **August 29, 1973**  
SUBJECT **AROCLOR TANK CARS**  
REFERENCE  
TO **W. B. Papageorge - B1NA**

cc **H. S. Bergen - B2SL**  
**W. R. Corey - B2SL**  
**T. L. Gossage - B2SL**  
**A. E. Leisy - 1740**  
**C. Paton - B2SC**  
**J. R. Sayage - B2SL**  
**B. R. Williams - 1740**  
**C. B. Williams - B1NC**

On July 2, you wrote requesting information on procedures we follow to assure that the tank cars we have in PCB service are not used for any other product by anyone. I am attaching to your copy a pencilled note from Bailey Williams and a memo from J. C. Smith indicating that the PCB fleet is carefully controlled and is used for nothing but the Aroclor service.

You are familiar with and have a copy of the labelling procedure used by the plant on tank cars of Aroclor. This clearly marks the cars as Aroclor cars. The personnel are instructed repeatedly on the control of PCB cars so that they are only in PCB service. In addition, they have very specific instructions on the procedures for washing cars to prevent contamination of the environment. Also, a washed car is never put into any other service until it has been adequately rinsed with biphenyl to assure that there is no detectable residual PCB's in the car.

Here in the General Offices Mr. Williams' group follows the movement of each loaded car in the fleet from the time it leaves the plant until it arrives at the customer's location. They follow the empty car after it is released by the customer until it arrives at our plant. They would therefore detect any movement of the car to an unauthorized location.

From the time the car enters the customer's plant until the time he releases it it is not under Monsanto's control. During this period I cannot assure you that the customer could not use it for some other purpose. I am sure in my own mind that this will not happen because they are aware of their responsibility and we have a hold-harmless agreement. I am sure, therefore, that they would control the cars within their plant location.

With that exception I am convinced that our controls are stringent and adequate to assure that we do not use the cars for any purpose other than PCB's and always have them under the best possible control.

*E. M. Potter*  
**E. M. Potter**

**EMP/er**  
**Attachments**

**MONS 028688**