Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
320 Interstate North Parkway
Atlanta, Georgia 30339
Phone: (404) 434-4949

Mr. Larry Crowe
General Electric Company
Rome Division
Redmond Circle
Rome, Georgia 30162

Dear Mr. Crowe:

Effective 15 August, 1975, Monsanto's charge for incineration of scrap or contaminated PCB fluids will increase to $.08/lb plus $8.00/drum to cover handling. Increased fuel costs in addition to the maintenance necessary to insure operation of this unit capable of temperatures in excess of 2000°F make this increase necessary.

I would also like to take this opportunity to review Monsanto's policy for incineration at Sauget, Illinois.

1. Some recent returns have been in completely unsuitable drums which have been severely corroded and unsealed. Some drums have been overfilled so that expansion in transit has not been contained. Loose stowage in trucks has resulted in movement of the load in transit.

   The results have been spillage into the truck and in some cases, contamination of other goods in the truck which then had to be destroyed. We have had to hold trucks at our plant for cleaning, attracting demurrage charges and diverting plant personnel from productive tasks.

   The potential cost of cleanup, had such leaks in transit caused detectable environmental contamination, might have been significant.

   Truck cleaning at Sauget increases the risk of escape of PCB-containing effluent from our own plant which could jeopardize our ability to continue normal controlled production. It would indeed be distressing if

PLAINTIFF'S EXHIBIT 45

WATER_PCB-SD0000001748

these incidents led to the inability of the industry to use chlorinated biphenyl in spite of industry efforts on ANSI C-107 and EIA ad-hoc committees.

We seek your assistance in ensuring that returns from your company are appropriately packed, sealed and stowed for return.

Costs incurred in handling inadequately packed returns will be billed to the company involved.

2. We have requested prior contact before EACH return so that we can send the required number of PCB Warning Labels. We are still receiving drums without warning labels. In the event of a spill in transit, the absence of warning labels could be a factor in assessing liability. We seek your help in ensuring that we send you enough suitable labels for each return.

3. We attach a copy of the form letters that we will be sending with labels to advise on correct return procedure.

You will note that this letter advises that our incinerator cannot handle solid waste. It is designed to handle liquid streams only. We still receive drums containing rags, sawdust, and metal and wooden components. In the past, our plant personnel have taken care to separate solid wastes and have arranged separate special disposal of the solid wastes. This will not continue. As from June 1, 1975, a charge of at least $100 will be made if labor is diverted to separating solid waste. Additionally, the solid waste will be suitably packaged and returned freight collect to the sender.

While we wish to continue to assist the electrical industry in disposal of liquid waste chlorinated biphenyl in our incinerator, we cannot and will not permit the service to become inoperable because of abuse by a small number of companies.

WATER_PCB-SD0000001749

We thank you for your assistance in regulating returns from your company.

Sincerely,

H. R. Ford
Southern Regional Sales Mgr.
Specialty Products Group

HRF/pr

IDS 003142

WATER_PCB-SD0000001750