Monsanto

FROM (NAME—LOCATION—PHONE): J. H. Craddock - St. Louis A2SA 4-4764

DATE: May 12, 1981

SUBJECT: MONSANTO PARTICIPATION IN CMA SURVEY FOR PCB'S TO ESTABLISH NEW REGULATORY CUT-OFF LEVEL

REFERENCE:

cc: J. R. Condray - G3WG
R. S. Nelson - A2SA
M. C. Throdahl - D1D
B. J. Wander - G3WG

TO:
C. F. Callis - B3CA
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F. E. Kearney - E2SA
W. B. Papageorge - G4WA
E. C. Spurrier - C2NA

Monsanto will participate in the Court ordered survey of PCB's generated as incidental or unintentional by-products of manufacturing and processing operations and certain totally enclosed PCB equipment used in manufacturing facilities. A brief summary of the survey and history of the Court actions is shown in the attached BNA reprint.

The survey will be coordinated by me on a Corporate basis and, as agreed, each operating company will designate a person responsible for managing the survey within that unit.

Timing is quite critical, since the schedule has been set by the Court and agreed to by participants in the litigation, including EDF, EPA and CMA (representing the chemical industry). The completed Corporate response is due in early August. Consequently, the individual plant/op unit responses must be completed and returned to me for consolidation into the Corporate submission in early July. I am targeting July 3 as the date for completion of these individual responses.

Each manufacturing process as defined in the survey (details attached as RRS protocol) must be included. "Negative responses" count.

A second part of the CMA survey regarding "totally enclosed" electrical equipment, e.g., transformers and capacitors and other now exempt equipment - such as hydraulic and heat transfer systems which will be impacted by changing the 50 ppm regulatory cut-off level, will be included in the survey. Details of this part of the survey are still being worked out, but should be finalized within 10 days.

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Please nominate a representative to manage the survey for your unit as soon as possible. I will arrange a meeting with these managers early next week to discuss the procedures and details of the survey.

Should you or any representative of your operating company receive a copy of the PCB survey from any other trade association, this should not be filled out but should be returned noting that Monsanto is responding directly through CMA as a member of the CMA PCB Task Force. (CMA has asked several other chemical and allied trade associations to participate in the data-gathering using the CMA survey procedure.)

J. H. Craddock

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enclosures

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