Monsanto

FROM (NAME & LOCATION): K. Warren Easley - Washington, D.C. - 1920

DATE: January 7, 1975 CC: H. M. Keating

SUBJECT: National Science Foundation

REFERENCE:

TO: D. B. Hosmer

You asked me to look into the NSF contract with Stanford Research Institute. Monsanto had received a questionnaire from SRI asking for considerable information on our production and disposal of a number of organic compounds.

I visited Dr. Ronald Goor of NSF who is in charge of the SRI program. His first comment was that Monsanto had received a letter from MCA, copy attached, which briefly explains the SRI study and urges cooperation. He also said that the program has been discussed at meetings of MCA's Subcommittee on Toxic Substances on which Monsanto is represented. The purpose of the program is to develop knowledge and is not directly connected with any regulatory activity. There is no EPA money involved; however, there is some cooperation between NSF and EPA. NSF hopes ultimately to be able to relate the chemical structure of organic compounds to their environmental effect. As a first step, they are surveying chemicals that are in commerce, are present in the environment and, potentially, represent environmental problems. The questionnaire is the basic part of this data-gathering stage. In a later stage, which will involve new contracts, they will try to develop screening methods to determine the impact of some of the compounds on ecosystems. Incidentally, the chemical industry helped formulate the questionnaire and is responsible for adding the questions about impurities.

Here are some further details. The people whom NSF coordinates with in EPA are Farley Fisher in the Office of Toxic Substances and Herbert Wiser in R&D. They are not coordinating with the Effluent Guidelines Division. Helping NSF in all of this is a panel headed by the well-known Dr. Norton Nelson. The panel includes Dr. Julius Johnson of Dow, Boyd Schaefer of American Cyanimid, Farley Fisher, Dr. Piver of HEW, Dr. W. Fulkerson of Oak Ridge, and Dr. Betty Weisburger of the National Cancer Institute. The panel considered some 275 organic compounds with regard to the volume produced, the amounts likely to be introduced into the environment, toxic properties, etc., and narrowed the list down to 84 which are covered by the questionnaires. The questionnaire is considered to be an easier approach than the alternative; namely, environmental monitoring. They do, however, plan to do some monitoring under a future contract with MIT. Effluents will be sampled at the discharges of cooperating companies and analyzed by gas chromatography and mass spectrometry.

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We all know that the state of the art in testing environmental impact of chemicals is rather primitive, yet the Toxic Substances Control Act, if and when it passes, will mandate that protocols be developed and that chemicals be screened and, where necessary, regulated. We should be glad that a research agency is attempting to advance the art of testing and is not just leaving the field to EPA. It follows that it is in our best interest to cooperate with NSF in this undertaking. Unless you see some overriding reason for holding back, I believe that you should fill out the questionnaires and submit them to SRI. If you can't fill in every blank, they will not be surprised.

K. W. Easley

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