Author: MICHAEL A PIERLE at MONESH01
Date: 4/4/95 11:59 AM
Priority: Normal
TO: DIANE B HERNDON at MONCOM01
Subject: Re: Ammonia reporting changes
---------- Message Contents ----------

This change has a big impact on our freedom to do pollution prevention that can produce better results.

I think it is a good way to communicate to all of Monsanto what we are trying to accomplish that supports the businesses and gives recognition to those who achieve the results.

If you want help in wording it constructively let me know.

AMMONIA

DSW 135788

Monsanto

FROM (NAME, LOCATION, PHONE) Michael A. Pierle, A3NA 4-8882

DATE: April 18, 1995

SUBJECT: Environment, Safety & Health Monthly Report -- March, 1995

REFERENCE:

TO: N. L. Reding , D1R

cc: E. R. Beaver, A3NB
J. R. Condray, A3NA
R. L. Harness, C2SB
J. L. Henshaw, A3NB
D. G. Herndon, A2SP
C. W. Keffer, A3NB
K. H. Kennedy, A3NA
P. G. Kenworthy, 1920
D. A. Meneely, G4WA
L. J. O'Neill, G4WA
D. B. Redington, A3NA
C. Wiltshire, 5045

Safety

There were no major injuries in March.

Through March, we have had 16 releases. This puts us behind last year's performance. A proposal has gone forward to the Manufacturing Leadership Council to set the 1995 goal equal to 1994 performance. We are reexamining whether a more aggressive target is in order.

Ammonia

Environmental Protection Agency (EPA) issued, in the Federal Register, the proposed rule changes for ammonia. There is to be a 30-day comment period. This should allow for EPA to finalize the rule for us to take advantage of it as we report the 1994 TRI (Toxic Release Inventory under SARA Title III) releases. As reported earlier, with this change we will see a significant improvement in Monsanto's TRI position. At the national level, we will be summarizing overall performance versus our 70% goal in conjunction with a relook at deepwell policy by mid-year.

Superfund

Now that the Contract with American has run its course in the House, it is possible to direct some attention on Superfund reform. Until the issue of retroactive liability is dealt with in early hearings, it is not likely that there will be progress. Industry efforts at The Business Roundtable and Chemical Manufacturers Association (CMA) are focused on understanding the impact of repeal of retroactive liability. Overall, this debate has turned quite introspective. Each company is now looking at how to improve its position. Therefore, this debate among industry will have to play out before there can be any unified attempt to go forward with reform. We should have a better understanding by the end of April as both CMA and The Business Roundtable have this as action items on their agenda.

ESH-IT (Integrated Technology) Project

The ESH-IT Project is expected to officially kick off next month. The final stages of contract negotiations are complete and the AR has been drafted, which will go to Bob Shapiro and the Board in April. Jeff Klieve, the project team lead, is assembling the high-performance team of professional who will design, develop and implement world class IT solutions for ESH.

DSW 135789

Quality Assurance Council

The QA Council met on March 20, 1995 to review, in general, the new organization and determine next steps is respect to reviewing QA functions across the enterprise. The purpose for the review would be to ascertain the applicability of shared services in QA and/or operational changes within QA functions which could reduce overall cost and increase QA effectiveness enterprise wide.

The Council agreed to conduct a review of all QA regulatory functions (e.g.good laboratory practice, good manufacturing practice, good clinical practice, etc.) and recommend organizational and/or operational changes which could result in more cost effective QA operations enterprise wide. The issue of what functions maybe best in shared services and what should remain in SBUs will also be addressed.

Regulatory Reform

Through the leadership of Paula Menten and Denny Redington, we have pulled together a targeted list of regulatory reform priorities for the organization. Working closely with Tom Helscher and Pat Kenworthy, the team is moving this agenda forward through both EPA and the Congress.

In addition, Paula continues to participate with the Pensacola plant on the pollution prevention project with NRDC and other industry. A meeting to take this project to the next level will be held in May at the Pensacola plant site. The outcome of this effort should be a case study of regulations which are high cost/low value requirements and an identification of opportunities where monies to be spent on low impact regulations could be better spent on pollution prevention activities.

Dioxin Reassessment

With the cooperation of the SBU and ESH reps, Denny Redington is moving forward on a plan to characterize dioxin emissions consistent with voluntary effort within CMA. Eventually, the voluntary efforts will become requirements per EPA regulation. There is an opportunity to understand our information early and be prepared for constructive discussions with communities and regulatory agencies.

TSCA (Toxic Substance Control Act) Premanufacturing Notice

EPA has finalized the TSCA Premanufacturing Notice (PMN) exemption rule for polymers, low risk materials and low volume substances. EPA indicates that 64% of all previous PMN submissions would have been excluded under these new rules. Corporate Stewardship is analyzing the rules and will issue guidance to the Strategic Business Units and Monsanto Business Services.

Pledge Awards

Five Pledge Awards will be presented at the 1995 Worldwide Manufacturing Conference. A distinguished panel composed of both Monsanto employees and external stakeholders selected the five award recipients from a group of 20 finalists.

MAP

Michael A. Pierle/gf

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Attachment

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