Monsanto

FROM (NAME—LOCATION—PHONE) J. H. Craddock - General Offices A2SA (4-4764)

DATE September 7, 1982

SUBJECT CMA Funding - PCB Activities

REFERENCE

C. F. Callis - B3CA
R. S. Nelson - A2SA
P. S. Park - G3WB
M. C. Throdahl - D1D

TO : W. D. Carpenter - G3WG
J. R. Condray - G3WG

The very high level of action in the new PCB rules area has significantly depleted the CMA PCB Special Projects Group funds. These funds amounting to about $150,000 were collected from nine company members at $12,000 each plus $50,000 from CMA Legal Department funds (David Zoll).

Attached is a letter from Ed Warren of Kirkland and Ellis, CMA's PCB SPAG Committee outside counsel, summarizing PCB legal activities and costs to date, and forecasting needed actions/costs for completion of the second and third PCB rulemakings.

Several SPAG committee members, including Dow, Du Pont, and me representing Monsanto, agree with Warren's conclusions of the breadth and possible impact of these issues on TSCA and regulations of the chemical industry.

Dow and Du Pont, CMA representatives, intend to try again to get broader CMA support and financing via CMA CRAC and/or the Regulatory Management Committees. I believe Monsanto should support those efforts for broader CMA funding of the PCB activities.

The alternative is for any remaining SPAG committee member companies to fund the total cost on a shared basis. This would increase Monsanto's direct costs significantly. One point to keep in mind is that in addition to these direct CMA costs, Monsanto and several other SPAG committee members are spending several thousands of dollars in addition in travel for our "experts" and committee members on travel and related expenses not counting time and salaries.

I would be happy to discuss this issue in depth if you deem it necessary.

J. H. Craddock

/dkr
Attachment

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