

Monsanto

FROM (NAME & LOCATION): D. B. Hosmer (4-2403) - General Offices, ELSF

DATE	July 9, 1973	cc	W. R. Corey
			W. H. Elwood
SUBJECT	Effluent Standards and Water Quality Advisory Committee		M. Foresman
			P. B. Hodges
REFERENCE	Meeting on July 5, 1973		C. S. Hoffman
			R. J. Kozacka
TO	Crystal Mall - Bldg. #2 Room 1112		M. L. Mullins
			W. B. Papageorge
	J. T. Garrett		M. Pierle

Since the meeting was quite informal, I did not get a complete list of committee members present but here is what I have:

Dr. Martha Sager, Chairman
Don E. Bloodgood
W. W. Eckenfelder, Jr.
Ramon Guzman
One other member not identified

As the meeting opened, Mr. Gus Speth who represents N.R.D.C. (a consumer environmental group) was permitted to make a statement concerning toxic pollutants as they are involved in sect on 307a of public law 92500. A summary of his remarks is outlined below.

The agency list of toxic pollutants represents a complete "cop out" from its responsibilities under the act. He outlined four points that he thought were important.

1. No toxic pollutant can be eliminated because the agency finds regulation too burdensome. The agency appears to have pre-conceived ideas about the list but it cannot omit any available information.
2. EPA cannot consider economic implications when considering toxic pollutants. He emphasized that less stringent standards cannot be considered because treatment is too expensive since it was the intent of Congress that toxics must be eliminated regardless of cost.
3. EPA should focus on inherent toxicity of pollutants without regard to concentration of the pollutant in receiving water.
4. The January 16th EPA Toxic Substances list should not be restricted to substances known to be discharged by industry. All toxic substances should be listed to prevent them from ever being discharged with no consideration given to whether they are being discharged now.

0053873

TOWOLDMON0055426

He pointed out that the current list is the shortest and the most limited he had seen. He said he had seen two lists dated 12/11/72 one of which had pollutants to be restricted immediately and another for those to be followed up on later. Then on March 1 he saw "list C" which was several times longer. He said he had complained that this list was too short. He held it up and from across the room I would guess there were 75 - 100 materials listed. Speth thought about 30 more substances should be added to the March 1 list (List C).

Finally Speth said the Sager committee represents his last hope of making the list longer short of litigation. He suggested that the committee should do at least two things:

1. Issue a decent set of criteria to define Toxic Substances.
2. Get all others involved who have no economic interest in the list.

He suggested advertising in Science magazine. This was not practical. It was finally suggested that the pollution digests might be notified as they might mention that meetings were scheduled.

Dr. Sager said meetings were to be held in late July and early August in New York, San Francisco and Chicago. She invited Mr. Speth to notify any environmentalists or other interested citizens. He said that he had very limited funds available for this purpose. Dr. Sager stated that her committee also had limited funds.

Comments were then made on the two contractors reports on the Guidelines listed below:

1. Arthur D. Little Plastics and Synthetics Industry
2. Roy F. Weston Organic Chemicals Industry.

It was agreed that the comments must be restricted because the contractors reports were received only a short time prior to the meeting. There was a good exchange of information with Prof. Eckenfelder leading the discussion.

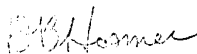
Our forward program for the organic chemicals industry report is as follows:

1. Messers Pierle, Hoffman, Foresman and Elwood will meet starting on July 9 to analyze the report to outline solid comments and criticisms we can make
2. Our comments will be developed by July 12 - 13 and circulated to each member of the MCA task force committee on Organic Chemicals.
3. Our comments with amplification will be given to George Rankey to permit him to develop a Monsanto presentation to be given both to the EPA guidelines group and Martha Sagers Committee

0053874

4. The MCA task force committee will meet on July 18 at 1 PM to develop the MCA comments for the industry. This will be completed by July 19.
5. The MCA task force will meet with the Sager committee to present detailed comments on both the Organic Chemicals Industry and the Plastics and Synthetics Industry reports at 9 AM on July 23.
6. Monsanto comments on these reports are due to EPA on July 22 and July 25. We will make comments on the Organic Chemicals Industry report by July 25 if a good set of comments can be developed.

Professor Eckenfelder went to lunch with us. He obviously thinks the contractors reports have grave deficiencies and we agree. He said if we thought that the Organic Chemicals Industry reports were bad we should see some of the others. He emphasized the importance of sound detailed comments and suggestions coming from industry. He stated flatly that the effectiveness of the committee with EPA was dependent upon our inputs. He shares our opinion that Al Cywin is a bureaucrats bureaucrat. It's obvious that Professor Eckenfelder wants to help us to obtain reasonable efficient guidelines.



D. B. Hosmer

BSH/at

0053875