Monsanto

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DATE : July 30, 1980

SUBJECT : PCB SURVEILLANCE PROGRAM - DIRECTION PAPER

REFERENCE :

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Attached for your information is a final draft of the PCB Surveillance Program planning documents, which incorporates comments/suggestions from you, other Environmental Policy Staff members and Phocion Park.

These principles will be used to guide this program for managing PCB issues.

J. H. Craddock

jb
enclosure
(to cc's)

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PCB-ARCH0745340

DIRECTION PAPER

Monsanto will act in a socially responsible manner in the management of its products as well as all other business activities. To that end, MIC will organize and manage a program for continued surveillance of and stewardship for the defunct polychlorinated biphenyl (PCB) product line. This program is consistent with and in support of Monsanto's Corporate Policy for Surveillance of Discontinued Products.

The major results targeted for this program are:

- Establish a Corporate focal point and center of expertise to organize, maintain and transmit information both within and outside the Corporation, including technical, regulatory, health, safety and environmental data regarding PCB's.
- Maintain continuing surveillance of PCB issues and activities, including research of the effects on health and the environment. Provide technical and financial support for the assessment by DMEH of effects of the material on man and the environment.
- Provide continuing surveillance of technology and regulations (new and existing) for handling and disposal of PCB's.
- Develop and implement a rational management plan capable of anticipating and dealing with all aspects and issues related to PCB materials.

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EX P-0945
Page 2 of 3

PCB-ARCH0745341

ACTIONS

- Maintain strong Corporate commitment to managing polychlorinated biphenyls (PCB's).

- Develop a strong, coordinated interdisciplinary team capable of responding to PCB inquiries through a central focal point. In addition to the PCB Coordinator/Manager, the team should include representation from Law, Public Relations and EPS. The team will recommend courses of action where indicated.

- Preserve up-to-date technical expertise and records in all aspects of PCB.

- Keep a low, but positive, Corporate profile in dealing with general public, media and regulatory agency personnel regarding PCB inquiries and information.

- Respond to specific inquiries using standard, written guidelines. Avoid top-of-the-head answers. Maintain records of inquiries/responses outside Monsanto.

- Coordinate Monsanto compliance activities.

- Coordinate Monsanto positions on new and existing PCB regulations.

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EX P-0945
Page 3 of 3