

Monsanto

FROM
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DATE : July 16, 1985

cc. W. J. McCarville - G3WD

SUBJECT : E. F. Hohlfeld Achievement Recognition

REFERENCE :

TO : R. B. Phillips
CS7N

I want to take this opportunity to recognize the support and achievement that Gene Hohlfeld has made to the PCB Issues Management Program over the past year and to suggest his nomination for an achievement award for his significant accomplishments.

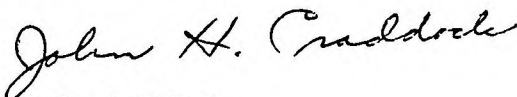
Gene was instrumental, this past year, in reviewing several sets of proposed PCB-Transformer Regulations being discussed and proposed by EPA under the Toxic Substances Control Act. His line by line analysis of these complicated proposed new rules and his comments on suggestions for workable alternatives were used in large part by the Chemical Manufacturers Association PCB Program Group for the chemical industry response and rebuttal to EPA.

EPA issued the new Transformer Fire PCB regulation July 1, 1985. In many provisions Gene's analysis and suggestions were fully taken into account and are implemented as the new PCB transformer regulations. In essence, Gene's analysis and suggestions resulted in exclusion of the chemical manufacturing industry sites (as well as that of other industries) from the 5 year mandatory transformer phaseout, as well as other onerous and costly provisions.

Adoption by U.S. EPA will result in a Monsanto cost savings in excess of \$15 million over the next 5 years plus cost of business interruptions.

Gene is still in the process of contributing to this program and is, in fact, reviewing the new PCB rules for technical content to insure that no errors have crept into the actual regulations.

I applaud Gene Hohlfeld's efforts and significant contributions to the PCB Issues Management Program and certainly support recognition of his accomplishments via an Achievement Award or other appropriate recognition.


John H. Craddock

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