Monsanto

SPECIALTY & PROCESS CHEMICALS DIVISION

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May 30, 1975

Mr. C. A. Tuttle
Aerovox Corporation
740 Belleville Avenue
New Bedford, Massachusetts 02741

Dear Cliff:

During its recent meeting in St. Louis, your EIA - PCB Working Committee requested that Monsanto submit an action plan relative to PCBs.

Due to the state of indecision and confusion that appears to exist within EPA I find it very difficult to prepare a precise action plan and schedule to meet each and every potential development. Under present conditions Monsanto's plans relating to PCB and Section 307a of the Water Act are as follows:

(1) We will remain informed of personnel changes within EPA and establish communications with those individuals with any influence in the promulgation of effluent standards. The individuals currently involved are Mr. R. K. Ballentine, standards; Dr. Leonard Guarraia, criteria (basis and purpose document); Mr. Joseph Vitalis, effluent cleanup and technology and Mr. Thomas Kopp, PCB representative, Office of Toxic Substances.

(2) We will meet personally with these individuals. During these discussions Monsanto strategy will be to influence the EPA in the following areas using Monsanto information or data from other sources:

(a) Definition of PCBs
(b) Analytical methods and round-robin testing
(c) Sampling methods and monitoring techniques.
(d) Effluent cleanup technology.
(e) Biodegradation differences.
(f) Adsorption by soil and significance to landfill disposal and entrapment by sediment in water bodies.

PLAINTIFF'S EXHIBIT 2144

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(g) Toxicity studies
(h) Background levels
(i) Bioaccumulation

(3) When proposed standards are published we will comment in writing and participate in public hearings or symposia as appropriate.

(4) If the final standards which are promulgated are unachievable and unrealistic, we will review our action plan with representatives of the capacitor and transformer industries.

Your committee can contribute significantly by "educating" the EPA, in writing and during discussions, in the design, use, servicing and manufacturing of electronic components including capacitors. Some suggested subjects are:

(1) The importance of PCBs in capacitors

(2) How capacitors are designed in unit systems

(3) How capacitors are used

(4) Problems which will occur in servicing and retrofitting if PCBs were not available

(5) The need for fire resistant capacitor fluids

(6) How capacitors are manufactured and how plant effluent is controlled

(7) The economic impact which would result if PCBs are effectively banned

These topics should be covered in considerable detail and with sufficient emphasis to get the desired understanding in EPA. This information should be presented to EPA prior to the publication of a proposed regulation, in written comments following publication and in testimony during hearings. To get maximum effect every opportunity to present your case should be exploited.

Sincerely,

Bill

W. B. Papageorge
Manager, Product Acceptability
Specialty & Process Chemicals

cc: Richard Rollins - Jard
Stuart Richel - General Electric
Roger Wills - Westinghouse
Thomas Browne - Sprague
H. S. Bergen - Monsanto
David Wood - Monsanto

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