Monsanto

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DATE : October 20, 1983

CC.

SUBJECT : Weekly Highlights - PCBs

REFERENCE :

TO : W. B. Papageorge

- CMA PCB Task Force "previewed" the proposed new PCB rule scheduled for December 1 with EPA staff. The good news is that EPA has taken the industry/environmentalist proposal and used it as the framework for the new rule to provide a workable, acceptable regulation. The bad news is that working level EPA staff are trying to justify their actions (which CMA/EDF/NRDC believe is not totally necessary) using poor science that might have significant impact on future chemical regulation. EPA is developing carcinogen and reproductive effect risk assessments on worst case ultra conservative scenarios not based on good heatlh effects science!

- CMA PCB Task Force is trying to marshall other industry groups and forces to attack the bad science risk assessment policies basis while the CMA PCB Group tries to preserve a workable regulation.

J. H. Craddock

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