Monsanto

FROM (NAME & LOCATION): E. T. Mollica

DATE: November 10, 1977

SUBJECT: PCB

REFERENCE: FJF/LAM 4 Nov. 1977

TO: F. J. Fitzgerald

cc: L. A. Miller
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D. Wood
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R. C. Isham
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In response to the question of what initiative Monsanto will undertake to clean up PCBs for the environment, raised by Mr. Hanley at the budget review, a meeting was held with Bob Isham, George Levinskas, Anna Navarro, Dick Stohr and David Wood to define Monsanto's position and response.

The basic Monsanto position has two aspects:

1. Monsanto has acted in a socially responsible manner in recognizing the hazard with PCBs, in voluntarily terminating production, co-operating with state and federal agencies, supplying requested data, and in plans for dismantling, decontamination and disposal of the production facilities.

2. Monsanto has no plans to initiate programs to physically remove PCBs from the environment. While the issue of clean-up has been raised by authorities in Alabama (our PCB unit), Illinois (Outboard Marine), Indiana (Westinghouse) and New York (G.E.), there are no federal laws or EPA regulations requiring clean-up from waterways. Monsanto has no intention of independently setting such a precedent. Further, there is no known technology for physically removing PCBs from lakes, streams, and rivers that will assure complete removal. The EPA has proposed regulations for disposal of solid waste (i.e. capacitors) containing PCBs, but we have no plans to underwrite the costs of that program.

These points are the basic parameters of an appropriate response. I have asked Bob Isham to develop several scenarios of answers in dialogue form which can be forwarded for Mr. Hanley's use. This can be accomplished within your thirty days deadline, i.e. by 2 December.

E. T. Mollica

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