

Monsanto

FROM (NAME-LOCATION-PHONE) L. W. Wassell - G4WF - 4-7002

DATE: April 25, 1994

SUBJECT: COUNCIL ON ECONOMIC PRIORITIES
ENVIRONMENTAL QUESTIONNAIRE

REFERENCE:

TO: M. W. McCombs
K. S. Miller

cc: S. R. Archer
E. R. Beaver
K. S. Cahill
G. F. Fort
L. J. O'Neill
D. B. Redington
R. F. Sackett

The Council on Economic Priorities is updating research reports on the chemical industry. The first round, completed in 1991, has been widely used by environmentalists and industry.

Attached are the questionnaires they submitted. The first page ("high-priority questionnaire") will determine 70 percent of Monsanto's ranking for record-keeping and disclosure. These are difficult questions, both in terms of gathering the information and structuring a response.

We're asking your help in responding to the third question on the first page ... **"For the Sauget, Illinois, facility, would you release waste reduction audits and material flow audits for the main production process?"** The definition of some of the terms is further implied by the question just above.

I would appreciate your thoughts in how to answer this question (as well as follow through on the implicit commitment to provide further information on request). I've enclosed the whole questionnaire to provide a better sense of context.

Please consider both the words and the substance of the question. For example, the only thing I know of that we call "audits" are the compliance audits. Yet, we may have something else -- say, a list of potential waste reduction projects -- that would be responsive to the question.

So, what I'm really asking is what we have that would be responsive, and whether you feel we could release that information if requested without harm in terms of competitive intelligence or other factors.

Deadline for Monsanto's response to the Council on Economic Priorities in May 15, so I would appreciate hearing from you within the next week or two.

Thank you.


Loren W. Wassell

DSW 134594

STLCOPCB4034552

Part A: High Priority Questionnaire

Questions?
Call Ken Birnbaum
at CEP: 212-420-1133

Responsible Care:

- Would you release the results of company-wide self evaluations for each of the six codes of the Chemical Manufacturers Association's Responsible Care® program? If so, please enclose them.

☐ Yes

☐ No

Audits:

- In the last five years, approximately what percentage of your facilities have undergone the following:

☒ regulatory compliance audits? _____

☒ waste reduction audits? _____

☒ audits of raw materials, intermediate chemicals, losses, and finished products (ie, material flows)? _____

- For the Sauget, Illinois facility, would you release waste reduction audits and material flow audits for the main production process?*

☐ Yes

☐ No

Emissions and Transfers:

- Please fill out the following tables for all wastes generated (in millions of pounds)

Air Emissions	1992		1993	
	U.S.	Worldwide	U.S.	Worldwide
Note: Some categories may overlap.				
Releases under the National Emissions Standards for Hazardous Air Pollutants				
Halocarbons				
All Other Hydrocarbons				
Nitrogen Oxides				
Sulphur Oxides				
Carbon Monoxide				
Particulates				

Water Discharges and discharges to public sewage (POTWs)	1992		1993	
	U.S.	Worldwide	U.S.	Worldwide
Halocarbons				
All Other Hydrocarbons				
Ammonia				
Heavy Metals				

*One section of our reports will focus on facilities along the Mississippi River.

DSW 134595

Part B: Full Questionnaire

Council on Economic Priorities
30 Irving Place
New York, New York 10003

When filling out our questionnaire ...

- ☛ If answers require more space than provided please use a separate sheet. Feel free to comment on our questions. We will carefully review all your responses.
- ☛ If company literature already answers our questions, please just refer us to the appropriate document (a page reference would be greatly appreciated).
- ☛ Questions? Call Ken Birnbaum at CEP: 212-420-1133, Fax: 212-420-0988

Monstanto Company
St. Louis, MO

Company Contact Person (Name, Title) _____

Phone (____) _____ Date _____

Waste Issues:

The Toxic Release Inventory

1. CEP receives SARA Title III data from the EPA and analyzes company releases. If your company had corporate-wide increases or decreases, please indicate the reasons, breaking them down (in percentages if possible) among categories such as **recycling, treatment, plant shutdowns** (closings or sales), **process changes** and **source reduction**.

2. If your company has reduced emissions under the EPA's "33/50" program, how have you made those reductions? Again, please detail how those reductions were achieved (in percent breakdowns if possible), using such categories as **recycling, treatment, plant shutdowns** (either closings or sales), **process changes** and **source reduction**.

3. Please fill out the following table listing wastes reported under RCRA by your company (in millions of pounds):

	1988	1989	1990	1991	1992
RCRA					

4. For the five year period above, please provide percentage figures to show how the above wastes were disposed:

	RCRA	
	On-site	Off-site
Recycled (material recovery)	%	%
Recycled (by combustion)	%	%
Incinerated	%	%
Landfilled	%	%

5. Please complete the following table on fines and penalties paid under the following acts (in dollars)? ☐ No Fines

	1991	1992	1993
RCRA			
CAA			
CWA			
SDWA			
TSCA/FIFRA			

6. Does your company or its waste handlers export hazardous wastes generated in the U.S. to other countries? If so, please identify.

Country:	Description of Waste

7. Do you monitor the destination of hazardous waste shipments by your waste handlers?
☐ Yes ☐ No

Waste Reduction

8. Please provide figures on what progress you've made decreasing the following emissions by indicating releases and transfers in 1988 and in 1993? If you have a projected emissions levels for the year 2000, please indicate the level in the last column.

	1988	1993	2000
Carbon Monoxide			
Methane			
Sulfur Dioxide			
Nitrogen Oxide			
Chlorine			
CFCs			
Other Halocarbons			

9. If you are decreasing CFCs in your manufacturing process, how are these reductions being made?

- ☐ Replacement with HFCs or HCFs
☐ Total elimination through new processes
☐ Both: Elimination _____% Replacement _____%
☐ Other _____
 (please specify)

Purchasing:

10. Do you have any standards on environmentally sound purchasing practices that are incorporated into your policy and/or procedures manuals? If so, please include a photocopy of them.

Workplace Health and Safety

11a. Who prepares your workplace and safety audits?

☐ company employees

☐ independent auditors

11b. Are these audits available to the public?

☐ Yes

☐ No

12. Please fill out the following table on Occupational Safety and Health Act (OSHA) and lost time issues?

	1987	1988	1989	1990	1991	1992
Annual number of reportable incidents under OSHA (per 200,000 person hrs)						
Annual number of OSHA complaints or citations (per 200,000 person hrs)						
Annual number of lost time workdays (per 200,000 person hours)						

Public Communication:

13. What mechanisms exist at your plants that permit concerned citizens to get involved in health, safety, and environmental issues? Are there any limits on citizen involvement?

14. What percentage of your facilities have the following:

Would you release
them to the public?

● An emergency response plan developed by plant officials
in conjunction with community first responders (Local
Emergency Planning Council, fire department, hospital, or
police department)?

_____% Yes ☐ No ☐

● A hazard assessment that would meet requirements
under the Clean Air Act rule for a range of releases,
including a "worst case scenerio" of a catastrophic release?

_____% Yes ☐ No ☐

Thank you very much for your time.

Please return to:

COUNCIL ON ECONOMIC PRIORITIES

Attn: Ken Birnbaum

30 Irving Place

New York, NY 10003-2386

Telephone at (212) 420-1133, or fax, at (212) 420-0988.