

FEB 21 1994

MONSANTO

FROM (NAME, LOCATION, PHONE) S. D. SMITH, F2EA, 4660

DATE: February 16, 1994

cc. Mike Foresman
Steve Krchma
Kevin Cahill

SUBJ: Strategic Plans - Sauget Sites

TO: Loren Wassell

As you are aware, the listing of the Sauget Sites onto the National Priority List (Superfund) has been expected for several years. Unfortunately, the sites do have enough "points" under the current EPA scoring system to qualify.

Numerous efforts have been made over the years to preempt the Superfund listing of the Sauget Sites. We tried to persuade Cerro Copper to join in a voluntary cleanup action of the Dead Creek area. Unfortunately they have no interest in the same. Furthermore, the IEPA has no interest in dropping the Superfund listing, even if a voluntary cleanup would occur.

Once the sites are proposed for the Superfund list we will initiate the following Strategic Plans:

- Submit comments in a timely manner supporting our positions that:

(1) the Former W GK Landfill should not be included in the listing since it is currently be remediated under a Court approved agreement with the IEPA;

(2) no part of the W GK plant should be included in the listing since it is in the RCRA Corrective Action process.

- Promptly initiate a PRP Group for each of the two listing areas, assuming a leadership role in each.

- The participating PRP group would initiate an extensive investigation in order to identify other PRPs.

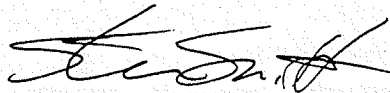
- Manage the sites through the Superfund system, with increased emphasis on public involvement and relations. The remediation of the Sauget Sites will probably be a very litigious process which will undoubtedly extend well into the next century (millennium).

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No change in our environmental reserves would be required until an initial RI/FS is completed and our allocation percentage can be estimated, as per our Corporate Controller's Policy.

I would be happy to provide a hour-long overview on the Sauget Sites if it would be helpful.

A handwritten signature in black ink, appearing to read 'S. Smith', with a stylized flourish at the end.

Steven Smith

DSW 134769

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