

DATE July 28, 1975

SUBJECT : PCB CONTINGENCY PLAN

REFERENCE : Your Memo July 1, 1975

TO : F. J. Fitzgerald - B3SA

CC:

PERSONAL & CONFIDENTIAL

Attached is our proposed worldwide PCB Contingency Plan based on the stated premise of a government ban with a 90-day phase-out period, assuming an October 1, 1976 ban effective 1/1/77.

Also attached is a proposed PCB Contingency Plan based on a case which the business group feels is possibly realistic considering present government attitudes and actions, customer responses and the "state of the art." This premise is a government ban announced 1/1/76 but with a compliance program and the ban to be effective 1/1/78.

We have had detailed inputs from Monsanto-Europe, as well as much detailed input from our business group personnel, our plants, plus Bill Papageorge and the Law Department.

In summary, we feel these two cases "bracket" the worst potential situation. In either case, certain actions are identical -- only the timing, odds of success and the financial impact on Monsanto are different. The two-year compliance case is on balance, in our opinion, the optimum for the U.S. government position, the total welfare of the population, the electrical utilities and other end users and the transformer and capacitor industry position and Monsanto's position.

We'll be glad to review this with you in detail if you desire. Please advise if these meet with your approval for the premises stated. There are other premises which can be evaluated should the occasion demand.



H. S. Bergen

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Attachments

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