

Transmittal

FROM (NAME & LOCATION) St. Louis, Missouri

DATE June 9, 1976

CC:

SUBJECT EPA ASBESTOS REGULATIONS

REFERENCE

TO : Messrs. R. E. Bilger
E. N. Brasfield
O. D. Dressel
T. F. Evans
R. A. Fenn
W. B. Hogeman
F. J. Holzapfel
D. E. Munie
S. T. Myers
R. S. Nelson
R. A. Pohl
W. R. Robirds
S. Serdarian
G. H. Shoptaw
C. J. Smith
G. L. Smith
J. E. Smith

PLAINTIFF'S
EXHIBIT
MON-153

Keep for Phil & Gordon

XC: F.H.D.
J.S.H.

✓ 6/21/76 PTH
Donnie,

Jim Edwards

Your mention of Asbestos in the I H paper is a good start.

I think you now need to follow up with a specific plan and increased visibility.

consider the following ideas:

1. Develop a detailed plant plot plan showing the location of asbestos
2. Get operations & maintenance to accept responsibility of notifying you before any asbestos work is begun.

Attached is a copy of a memo from Phocian Park and Pete Cunningham regarding the U.S. EPA enforcement of asbestos regulations. This memo was sent to the company representatives on the Corporate Environmental Control Committee.

These members have the responsibility of feeding back to the plants the information that they need to assure compliance and not place themselves (the plants) in violation of the law. The maximum penalty is one year in prison or a \$25,000 fine or both.

This memo is only to assure communication to you and provide a double source of input to the plant managers.

G. L. Bratsch

GLB/ams

Attachment

3. Master record file to be maintained by you.

4. Develop a simple but complete written procedure covering the entire question.

Don't know if this is the same as 7/16/76

I would like to know your plan and cost table by July 1
Donnie

C 003182

June 8, 1976

EPA Asbestos Regulations

Messrs. D. E. Cayard
D. B. Hosner
H. M. Keating
J. E. Lipe
F. L. Turner

cc: A. W. Andrews
✓G. L. Bratsch
P. F. Cunningham
D. L. Eby
T. C. Ford
J. T. Garrett
L. D. Shand

The U.S. Environmental Protection Agency appears to be giving increasing attention to enforcement of the regulations which have been promulgated pursuant to Section 112 of the Clean Air Act. This is particularly true with respect to asbestos, as evidenced by the recent conviction, in a U.S. District Court in New Orleans, of a demolition company and its foreman for violation of the asbestos control regulations. Sentencing of the defendants has not yet taken place, but the maximum penalties are one year imprisonment or a fine of \$25,000.00 per day of violation, or both.

It is important that all Monsanto sites comply fully with these regulations. Two copies of the asbestos regulations are attached. Will each of you please see that every facility within your operating company is made aware of these regulations and of the importance of complying with them. Note that, among other things, advance written notice to the EPA is required in the event of demolition or renovation work involving asbestos materials covered by the regulations.

Please contact the undersigned if any clarification of the regulations is desired.

P. F. Cunningham

Phocion S. Park

jf

Enclosures

C 003183