Monsanto

FROM (NAME & LOCATION) W. R. Richard - Research Center

DATE December 30, 1968

SUBJECT AROCLOR - WILDLIFE

REFERENCE

TO W. A. Kuhn - WKUHN

cc: H. Bergen HBERG
P. Hodges PHODG
E. Wheeler EWHEE
E. Tucker JFQ
D. Olson DOLSO
R. Kountz RKOUN
R. Davis RDAVI
W. Johnson WJOHN

Bill, you wanted to become more familiar with the legal-political problems facing Aroclor with regard to pollution and the accusations in the literature that chlorinated biphenyls are poisoning and killing wildlife.

These wildlife people have to be taken seriously. They have taken the DDT industry to court in Wisconsin to prevent the use and sale of DDT in Wisconsin and if they win in that state, DDT will be banned in many others. This case was on National Television last week. The wildlife people are dedicated to the demise of DDT.

Our problem is that Aroclor has been "identified" along with DDT residues and hence we are almost certain of being drawn into the court records and may also be one of the scapegoats of the DDT defense. The wildlife people have accused Aroclor of doing all the bad things of DDT.

We are taking 3 steps to protect ourselves. Scott Tucker and R. Keller are to repeat some of the analytical identification work feeding Aroclor to chickens and seeing if Aroclor is really present as "shown" by the literature. I hope we have been falsely accused but maybe Aroclor is present.

E. Wheeler is having feeding tests done on animals to establish a "safe" level for Aroclor feeding. If we can find a "safe" level Calandra's Lab will do 2 year experiments on animals including effects on succeeding generations. This will help a bit but the wildlife people won't be stopped by this kind of evidence.

MONS 097307

IN-10 REV 11 66

DEPOSITION EXHIBIT 37 6/26/14 LG

TOWOLDMON0007943

Arvel / wildlife

The third step is to minimize exposure of Aroclor, to reduce air and water pollution, to restrict Aroclor to uses which can be controlled. This is the only way I see to survive.

I believe we should make sure that our plants have minimum air or stream pollution. I believe Anniston is vulnerable and that off-gas HCl and Aroclor should be 100% controlled. Krummrich may also need help.

I believe we should demonstrate that Aroclor can be incinerated to harmless products for disposal.

I believe we should help our customers dispose of off-grade or non-reworkable Aroclor, either by incinerating or by toxic dump.

I believe plasticizer group marketing should know where their product is going and be able to minimize exposure risk if Aroclor has truly been identified as a pollutant.

We probably have 6 months to 1 year while they fight out the DDT case. I want to use this time to minimize our exposure. We will need your help in setting TSD targets.

Bill R.

W. R. Richard

ms

TOWOLDMON0007944