Attachment "A" – Scope of Work
Proposal to Complete Research Relating to the Use and Disposal of Poly-Chlorinated Biphenyls (PCBs) by Monsanto

Introduction

Allen Stewart, P.C., has requested HRA Gray & Pape, LLC. (HRAGP), to prepare a scope of work (SOW) and budget to conduct research relating to the historic uses and disposal of poly-chlorinated biphenyls (PCBs) manufactured by Monsanto from the 1930s through the 1970s. The research will focus, in particular, on industry practices pertaining to the disposal of these and other similar chemicals during this period. For Phase I of this project, HRAGP proposes to complete the bulk of our research within historic trade journals, congressional records, and federal agency documents available at either the University of Montana's Mansfield Library or the M.D. Anderson Library at the University of Houston, as well as using available online sources.

In addition, HRAGP proposes to complete a research trip to the Washington University Archives in St. Louis, Missouri, which houses a large collection of Monsanto Company records, as well as the papers of individuals who held high-ranking positions with the company. HRAGP anticipates that additional research trips will prove necessary during Phase II of this project. Therefore, HRAGP has identified several additional repositories that may contain useful records for the project and that we can visit during Phase II. These include the Wisconsin Historical Society in Madison, Wisconsin; the U.S. District Court for the Northern District of Alabama in Birmingham; the Environmental Protection Agency's Region 4 offices in Atlanta, Georgia; and the National Archives and Records Administration in College Park, Maryland. As research for the project proceeds, HRAGP will submit additional SOWs and budgets to Allen Stewart, in anticipation of completing research at these – and possibly other – repositories.

HRAGP is well qualified to complete this project, having conducted similar research efforts relating to the history of environmental clean-up and the identification of potentially responsible parties since the company was established over 30 years ago. Our staff of historians has extensive experience in researching land and natural resource issues throughout the western United States, often in support of litigation.

During Phase I, HRAGP will complete the following tasks to address the needs of attorneys at Allen Stewart, P.C.

Task 1:
Project Administration

Senior Associate Historian, Daniel Gallacher, will serve as project manager and principal investigator for the project. In this capacity, Mr. Gallacher will maintain frequent contact with Allen Stewart in order to inform the client of HRAGP's research progress and to respond to changing needs the client might have.

Task 2:
Research at the University of Montana's Mansfield Library and the M.D. Anderson Library at the University of Houston

HRAGP historians will conduct research within historic industry trade journals and federal government documents available at the University of Montana's Mansfield Library and the M.D. Anderson Library at the University of Houston. Historic trade journals for the chemical industry will likely provide invaluable information regarding industry practices and industry standards pertaining to the handling and disposal of chemicals such as PCBs during the mid-twentieth century. HRA's review of industry trade journals will include, but not be limited to, titles such as *Chemical Week*, *Chem 26 Paper Processing*, *Chemistry and Industry*, and *Pulp and Paper*. In addition, HRAGP historians will review and copy all congressional reports and hearings relating to the disposal of PCBs, as well as researching pertinent federal agency annual reports – such as the annual reports of the U.S. Public Health Service, the U.S. Fish and Wildlife Service, and the U.S. Food and Drug Administration – for information relating to the disposal practices for PCBs and other related chemicals.

Task 3:
Review Online Sites for Documentation Relating to Pertinent Legal Cases

HRAGP historians will review pertinent online sites, such as Lexis-Nexis and Pacer, to obtain information and documentation relating to legal cases involving the disposal of PCBs and their widespread impact on human health. In addition, researchers will review and download all pertinent documents on the Environmental Working Group's "Chemical Industry Archives" website relating to the contamination of Anniston, Alabama, through PCBs.

Task 4:
Research at the Washington University Archives, St. Louis, Missouri

The Washington University Archives houses a significant collection of corporate records – roughly 228 linear feet of paper documents and 171 linear feet of media material – relating to the Monsanto Company. These include corporate annual reports, records relating to the company's operating facilities, and documents pertaining to company products. In addition, the archive holds the papers of some individuals who held high-ranking positions within Monsanto during the mid-1900s. These include the papers of Charles Allen Thomas, who was the director of the Central Research Department from 1936 to 1946 and the president of Monsanto Chemical Company during the 1950s.

Task 5:
Draft Report

After completing the research discussed in Tasks 1-4 above, Gallacher and other HRAGP historians will write a draft report outlining the industry practices and industry standards pertaining to the handling and disposal of PCBs from their initial use in the 1930s through the 1970s, when the use of these chemicals was discontinued.

Deliverables

Upon completion of Task 6, HRAGP will provide two copies of the completed draft report, along with copies of all footnoted materials, to the client.

Timetable

HRAGP will initiate the research as soon we are given a notice to proceed. We will complete tasks and deliverables within the timelines established by the client.