Monsanto

FROM
(NAME—LOCATION—PHONE) J. H. Craddock - B3NA (4-4764)

DATE : February 1, 1984

cc.

SUBJECT : Monthly Report - January 1984
PCB Surveillance

REFERENCE :

TO : W. B. Papageorge

HIGHLIGHTS

- New Regulations

USA

Draft reply comments on behalf of Monsanto Company for the new incidental PCB regulation have been completed with input from various staff departments and operating units. Final copy will be submitted to EPA by the close of business February 3. Monsanto Company generally supports the new rule proposed by the industry/environmentalist coalition but objects to the poor science methodology used by EPA for its justification for fear of setting a bad precedent.

Europe

Holland reportedly has prepared a draft set of PCB regulations closely paralleling those of the U.S. The regulations are expected to be signed before February 1 and go into effect about March 1. Speculation is that many Common Market countries will follow suit.

- Litigation

[redacted]

- Plant Activities

Site Spill/Clean-Up

PCB concerns arose associated with clean-up of various sites employed for various Monsanto services and operations including:

1. MOTCO Disposal Site, Texas City (MFI)
2. Research Triangle Park Center "Duck Pond" (MPP)
3. Soda Springs Plant Transformer Disposal (MIC)
4. Findette Corporation, St. Louis (MIC), Outside Processor

DETAILS

1. Objective

Influence more reasonable regulation of PCBs by State and Federal agencies.

Status

- New U.S. PCB Regulations

Reply comments on behalf of Monsanto Company for the new incidental PCB regulation have been completed with input from various staff departments and operating units. Final copy will be submitted to EPA by the close of business February 3.

Monsanto Company, as a party to the industry/environmentalist coalition that proposed the "consensus rule" to EPA in April 1983, the framework for the proposed EPA regulation, generally supports the December 8 proposed rule. However, Monsanto Company opposes the poor science and bad methodology used by EPA in performing health risk assessments for carcinogenicity and reproductive effects and generic exposure scenarios used by the Agency to justify the proposed rule.

In addition, for the record, Monsanto Company opposed EPA's interpretation of Congressional intent in TSCA Section 6(e) relating to inadvertent PCBs generally.

As part of our reply comments, Monsanto engaged independent consultants in toxicology and risk evaluation, Drs. Harbison and James, University of Arkansas Medical School, to provide a detailed review and critique of the EPA support documents. This critique will be submitted to EPA as part of the Monsanto comments.

- PCB Regulations - Europe

Holland reportedly has prepared a draft set of PCB regulations closely paralleling those of the original May 1979 U.S. rules. These rules cover deliberate manufacture, use, marking, storage and disposal of PCBs. The regulations are expected to be signed before February 1 and go into effect about March 1. Speculation is that many Common Market countries will follow suit.

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2. Objective

[redacted]

Status

- [redacted]
- [redacted]
- [redacted]

3. Objective

Provide guidance to Monsanto facilities for cost effective compliance with PCB rules and regulations.

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Status

- Site Spill/Clean-Up

PCB concerns arose associated with clean-up of various sites employed for various Monsanto services and operations including:

1. MOTCO Disposal Site, Texas City (MFI)
2. Research Triangle Park Center "Duck Pond" (MPP)
3. Soda Springs Plant Transformer Disposal (MIC)
4. Findette Corporation, St. Louis (MIC), Outside Processor

MOTCO Superfund Site

PCBs have been found in low levels, but greater than 50 ppm in sludge and liquid waste at MOTCO. This finding could double the clean-up cost if rigid PCB disposal requirements are imposed. Attempts were made to identify former PCB product customers among the known PRPs.

Research Triangle Park Site Sale

Low levels of PCB, less than 50 ppm, have been identified in an old pond at the RTP site which has been inactive, except for cosmetic purposes (i.e, ducks, fish, etc.), since the late 1960's. Emotional issues raised have complicated the sale and "clean-up" of this property.

Soda Springs Plant Transformer Incident

The alleged PCB transformer disposal incident at Soda Springs was reopened as part of a Civil action by the EPA against the disposer relating to clean-up. Monsanto employees are being subpoenaed for testimony again, this time by the waste contractor attempting to implicate their company under joint and several liability.

Findette Chemical Contamination/Clean-Up

Findette Chemical, an outside processor who formerly processed used PCB fluids, visited to ask for assistance in dealing with EPA (Region VII) on a site contamination/clean-up problem. The discussions, now several years old, have taken a new course with EPA asking for lists of customers/suppliers of all chemicals processed at the site under "Superfund" regulations. Allegedly, EPA attorneys have asked Findette to name Monsanto as a PRP.

J. H. Craddock

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