

BCC: L. Fernandez  
J. W. Hanley  
J. T. Nolan  
12/13/79

Monsanto

Bcc on 12/14 to  
D.R. Bishop  
W.R. Corey  
W. J. McCarville  
G. Roush

MONTE C. THRODAHL  
Senior Vice President

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63166  
Phone: (314) 694-2905

December 13, 1979

Mr. Stuart E. Eizenstat  
Assistant to the President for  
Domestic Affairs and Policy  
The White House  
1600 Pennsylvania Avenue  
Washington, D.C. 20500

Dear Mr. Eizenstat:

We were somewhat surprised to read a news article in the December 12, 1979, issue of the Washington Star describing the formation of a government task force to investigate the effect of exposure to the ingredients in Agent Orange. The article included a reference to an investigation of employee exposures at three specified geographic sites, two of which (Nitro, West Virginia, and Sauget, Illinois) appear to be Monsanto manufacturing plants.

This letter is to bring to your attention a series of epidemiology studies sponsored by Monsanto which have been underway for some time at both sites to determine the chronic effects, if any, of exposure to certain chemicals which were used in the manufacture of the pesticide referred to as "Agent Orange." (It should be noted that such chemicals have not been manufactured at the Nitro, West Virginia, site since 1969, nor at the Sauget, Illinois, site since 1970.) A report of one of three studies recently completed at the Nitro, West Virginia, site is attached for your information. As you see, it indicates no adverse long-term effects as a result of exposure to the chemicals as a result of an industrial accident in 1949. This study has been accepted for publication in the Journal of Occupational Medicine, and prepublication copies have been sent to NIOSH, OSHA and EPA. The results of the other studies will be available within the next 60 days, and they will be made public in a similar fashion.

CONFIDENTIAL

C04137

236547

Mr. Stuart E. Eizenstat  
The White House  
December 13, 1979  
Page 2

In view of the considerable effort which has already been expended in gathering this information, including the involvement of NIOSH and Air Force personnel, along with outside consultants and Monsanto's own epidemiologists, we believe that this information should be of assistance to the interagency working group which you announced yesterday, and suggest that the present studies be completed and reviewed before any additional epidemiological work at these two sites is contemplated by the government.

Monsanto will be delighted to cooperate with the inter-agency study in any way we are able or to provide data we have collected to an overall study of this important issue.

Sincerely,

*M. C. Throckmold*  
M. C. Throckmold

MCT/mw

Attachment

236548

# Monsanto Backgrounder

EPA/NITRO DIOXIN TESTING

MONSANTO COMPANY / ST. LOUIS, MO.

June 23, 1983

EPA Region III (Philadelphia) has announced that it plans to test for dioxin at 12 sites -- four each in Pennsylvania, West Virginia and Maryland. One of these sites is Monsanto's Nitro, West Virginia, plant.

Monsanto and EPA have been discussing this proposal since early April, and it is our intention to cooperate with EPA in carrying out this program.

The Nitro plant is a target of the EPA testing program because this facility manufactured the herbicide 2,4,5-T from 1948 to 1969. Dioxin was formed in trace amounts as an unwanted, unavoidable contaminant in this production process.

The 2,4,5-T equipment was dismantled, decontaminated and buried on the plant site over 10 years ago. Except for filter cloths, dust bags and floor sweepings, the 2,4,5-T process was fairly "clean"...solid waste did not normally result from the manufacturing process. The filters, dust bags and floor sweepings were burned in the plant incinerator -- a standard, acceptable practice during the 1950s and 1960s. Any liquid waste generated from this process was sent to the plant sewer system, the same as any other plant effluent in those days.

002603

The Nitro plant's dioxin monitoring program has always focused on assuring that any residual dioxin contamination that might exist from past manufacturing operations is being contained on the plant property and that the employees are not being exposed to it. Thus we have sampled for this compound in monitoring wells at the disposal site, in the plant's waste water and in the water from the Kanawha River. The EPA was advised of this testing program in advance and invited to participate in its implementation.

While we've never found any dioxin down to the limit of detection (10 ppt), this is not to say it isn't present somewhere on the plant site in some harmless, miniscule amount beneath the surface. Indeed, based on published reports of recent research, scientists have established that dioxin is ubiquitous in the environment and stems from most combustion processes. In addition to manufacturing sources, these include power plants, municipal trash incinerators, automobile engines, cigarette smoke and woodburning fireplaces. Dioxin has even been found in the background air in cities throughout the United States in the parts per billion range.

The point of all of this is that dioxin can be found in the environment almost anywhere if one looks for it and has the technical ability to detect it.

The question then becomes not whether dioxin can be found but, rather, does its presence constitute a potential health or environmental hazard.

With respect to Monsanto's Nitro plant, the answer is an emphatic "no." We've assured ourselves that no dioxin problems exist at this site. This particular workforce is probably the most medically studied employee group in the world. Three separate health studies have been conducted on employees at this location including those who worked in the 2,4,5-T unit. Other than a residual skin disease, known as chloracne, no long term health problems that could be associated with exposure to dioxin have ever been found.

Furthermore, we've tested our waste water effluent, the river water and monitoring wells installed to check the integrity of the plant's old disposal site. No environmental problems exist from any dioxin that might be present below the surface stemming from former operations.

So we don't understand this sudden interest in testing for dioxin at a location where no problems exist. This, notwithstanding, Monsanto has always shared information and cooperated with both state and federal agencies at all of our manufacturing locations. We intend to continue with this policy and thus we are cooperating with the EPA on this new request.

Suffice it to say, Monsanto is fully committed to protecting the health and safety of its employees and its plant communities and we'll do whatever we have to do to maintain their trust and confidence. We view this clearly as our responsibility.

At the same time, the EPA, the Centers for Disease Control and the news media have a responsibility to keep the subject of dioxin in perspective. To this point, we agree with the sense of a resolution issued recently by the American Medical Association's House of Delegates which said, in effect, that dioxin has been made the focus of a "witch hunt" through the dissemination of rumors, hearsay, unfounded hysterical pronouncements and doomsday forecasts.

The AMA resolution stated that there is no scientific evidence that dioxin poses an imminent danger to people. The AMA further committed itself to a campaign aimed at countering what it called "hysterical malreporting" about the chemical. We applaud their stand and join them in this effort and would urge others, especially those empowered with the public trust, to do likewise.

-o0o-