[9] From: GLORIA JERNIGAN at DEC 12/4/91 1:31PM (2464 bytes: 62 ln)
To: JOHN H CRADDOCK at MONESH01, JOHN GARY WILEY at DEC, RICHARD H JOSLIN at DEC, PETER C WRIGHT at ICF
cc: ALLAN M FORD at MON3CM02, GARY W MAPPES at MONESH01, B MASON HUGHES at MON3CM02, LEON F HEBERT at DEC
Subject: RECOMMENDED STRATEGY FOR MEETING WITH EPA REGION IV
---------- Message Contents ----------

The following is from Bill Board (7350) 1690:

DRAFT

MONSANTO

From: W. J. Board

Date: December 3, 1991 c: L. F. Hebert
A. M. Ford

Subj: RECOMMENDED STRATEGY FOR MEETING WITH EPA REGION IV

Ref: 1 - Disputed Pensacola RCRA Post-Closure Permit
2 - Anomalous Pond Sludge PCB Data
3 - UWF/EPA Bioremediation Research Proposal

To: J. G. Wiley
R. H. Joslin
P. C. Wright
J. H. Craddock

Who Addresses

When December 1991

What Suggested agenda outline

1. Monsanto wants to voluntarily close the pond and would already be planning to do such except for anomalous sludge PCG data (a TSCA issue). ? Is it ?

2. Describe the PCB data, and request agreement to solidify the sludge in situ as if PCB data were <50 ppm.

3. If they agree, commit to closing the pond by December 1994. why so long?

4. If the disagree, propose a 3-6 month resampling plan (involving them) to clearly establish the distribution and concentrations of PCBs.

5. If this resampling plan shows PCB levels <50 ppm, commit to closing the pond the December 1995. why so long?

6. If this resampling plan shows PCB levels >50 ppm, commit to funding a sizable 3 year UWF/EPA research proposal designed why?

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to reduce PCB levels to <50 ppm.

7. If they agree, commit to closing the pond by December 1997.

What if:
They disagree with this voluntary approach and want to force us to do something?

Precipitous; we fall back to our best possible legal defenses.