Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

November 30, 1983

Dr. Steve Hamilton
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

Dear Steve:

Enclosed are EPA's latest--three risk assessments on PCB health and environmental effects. These are the documents Baumel and his group told us they would produce.

CMA and Monsanto (as well as AIHC and others) plan to comment on the methodology and poor science precedent. However, the CMA PCB group and individual companies will support the December 1 incidental rule.

The agency wants this rule and appear to be trying to get our continued support although they know we will strongly resist the risk assessment methodology precedent and argue about the results of their documents. Marty Halper did say that he felt these documents would support a spill clean-up level at a higher level in the range of the incidental rule (e.g., 25-50 ppm). This remains to be seen.

We will work for a clean-up regulation and try to get support again from Jackie Warren and Ellen Silbergeld. I personally don't want to get tied and committed to EEI and Toni Allen next time around.

Sincerely,

John H. Craddock
Product and Environmental
Safety Director

/dg

Enclosures