

MONSANTO PCB POSTURE

Result Desired - Develop a sound, socially responsible position for Monsanto in PCBs and organize to manage it on an optimum long-term basis.

Recommendation Monsanto should take the offensive on PCBs by initiating a well organized, one to three year program based on the positive tone of our response to the Eckhardt Committee. This program should include:

- The gathering and communication of epidemiological data which currently show no significant negatives in humans exposed to PCBs. One of the studies was done at GE by Dr. Selikoff.
- Actions designed to accelerate EPA approval of PCB incineration. All incineration has been suspended since April, 1978 and no route exists for PCB disposal.
- Commitment to develop a quick, easy to use method of analysis to detect the presence of PCBs. Confusion about the presence of PCBs has led to totally invalid, but emotional media reports.

Leadership responsibility for the PCB program should be vested in Mr. Throdahl's Environmental Group for the following reasons:

- . PCBs are the number one environmental issue on a Corporate basis. It seems logical that the proposed program be handled by the Staff Group directly responsible for the environment.
- . The Throdahl organization has ready access to the necessary skills in DNEH, Environmental Law, Public Relations and Environmental Management.
- . Assignment of responsibility to the Corporate Staff Group directly concerned would minimize the people turnover problem which is a major negative associated with continuation of the program in the Specialty Chemicals Division.
- . The spokespersonship portion of the program could be handled by Messrs. Throdahl and Bishop along with the responsible manager involved.

Situation

- Incineration of PCBs has been prohibited by the EPA pending formal permit approval of incinerator

sites. The prohibition, effective April 18, 1978, has led to a nationwide backlog of PCBs awaiting incineration. Permit approval for one or two incinerators may come in April-May, 1980 after a successful trial burn, assuming no opposition to PCB transport from the environmentalists.

Since mid-1979, Monsanto's position has slowly shifted toward a more assertive role. Concern about possible negative impact on Monsanto's legal position has inhibited offense actions in the past.

Recent epidemiological studies at GE (Selikoff), Westinghouse (Center for Disease Control) and Sangamon (National Institute for Environmental Health) have shown no significant negatives in humans as a result of PCB exposure. A similar study is under way at WGL.

Our response to the Eckhardt Committee will emphasize Monsanto's responsible role in PCBs and the rapidly accumulating epidemiological data which show little or no toxic impact in humans exposed to PCBs.

Corporate PR (Dan Bishop) is assuming all PCB responsibility from MIC effective December 1. All PCB litigation has been handled by Corporate Law for sometime.

MONS 019374

There is good evidence that the residual PCBs in the environment are slowly disappearing. For example, herring gull eggs have shown reduced PCB levels for the past four years in a row.

Monsanto has the opportunity to contribute positively to the PCB problem in the following ways:

1. Safety Facts - Monsanto can take the lead in assembling and distributing safety data which to date demonstrate reasonable levels of human safety for PCB.
2. Consumer Information - Consumer publicity based on safety facts can be used to reverse the widespread fear of PCBs. CFOL would be an excellent vehicle to use in this program.
3. Disposal -
 - a. Incineration - publication of available human safety data should minimize the threat of transportation tie-ups enroute to incineration.
 - b. Recovery from the Environment - \$84K is being spent at MIT and NYU in 1980 in an attempt to develop a feasible recovery/containment approach for the environment. Odds of success, however, are low.

4. Analytical Method - A quick, foolproof method for PCBs is not available. Such a test might be developed by Monsanto analytical chemists and distributed broadly through the EPA.