Monsanto

FROM (NAME & LOCATION): W. A. KUHN -ST. LOUIS

DATE: SEPTEMBER 16, 1969

CC.

SUBJECT:

REFERENCE:

TO : H. S. BERGEN
W. R. RICHARD

Here are some comments on the "Defense of Aroclor" draft:

I agree generally with Bill's guesses regarding the eventual actions required, but I find it difficult to believe that the associated problems will occur as rapidly as implied. I feel this way because there seems to be only a few, if any, proven replacement products available as substitutes for Aroclor users and I don't believe local, state or federal governments will force the shutdown of private industries until they have been given reasonable opportunity to clean up losses and/or change to substitute products.

I think the action being taken at both of our own plants is at an appropriate level. Paul Hodges has promised to summarize this for the Business Group so that each member can be aware of the action and can comment, if desired. Although our plants contribute relatively minor quantities of the overall stream and air pollution, we recognize the possibility that they could become prime government targets simply because they produce PCB's.

I think we are foolish to believe that collection for recovery or incineration will make much of a dent in the overall problem. We ship about 20 M pounds/year in drums. Whatever a customer leaves in a drum eventually ends up in a natural stream of some sort and the total could be as high as 200 M pounds/year. From what we know today, this is about 20 times the Anniston plant loss and it's spread among some 40-50 customers. Even this is a small loss compared to the several million pounds per year thrown to the atmosphere via incineration of carbonless carbon paper by innumerable users.

Currently, we have many people contributing very minor fractions of their time to the PCB problem. Perhaps we should consider budgeting one full-time man to coordinate all facets of the problem.

W. A. KUHN

DSW 202625

P - 28

IN 10 REV 11 65

STLCOPCB4052824