Monsanto

FROM (NAME & LOCATION) E. T. Mollica

DATE : November 10, 1977

cc: L. A. Miller
J. T. Nolan - DlA

SUBJECT : PCB

REFERENCE : FJF/LAM 4 Nov. 1977

TO : F. J. Fitzgerald

In response to the question of what initiative Monsanto will undertake to clean up PCBs for the environment, raised by Mr. Hanley at the budget review, a meeting was held with Bob Isham, George Levinskas, Anna Navarro, Dick Stohr and David Wood to define Monsanto's position and response.

The basic Monsanto position has two aspects:

1. Monsanto has acted in a socially responsible manner in recognizing the hazard with PCBs, in voluntarily terminating production, co-operating with state and federal agencies, supplying requested data, and in plans for dismantling, decontamination and disposal of the production facilities.

2. Monsanto has no plans to initiate programs to physically remove PCBs from the environment. While the issue of clean-up has been raised by authorities in Alabama (our PCB unit), Illinois (Outboard Marine), Indiana (Westinghouse) and New York (G.E.), there are no federal laws or EPA regulations requiring clean-up from waterways. Monsanto has no intention of independently setting such a precedent. Further, there is no known technology for physically removing PCBs from lakes, streams, and rivers that will assure complete removal. The EPA has proposed regulations for disposal of solid waste (i.e. capacitors) containing PCBs, but we have no plans to underwrite the costs of that program.

These points are the basic parameters of an appropriate response. I have asked Bob Isham to develop several scenarios of answers in dialogue form which can be forwarded for Mr. Hanley's use. This can be accomplished within your thirty days deadline, i.e. by 2 December.

E. T. Mollica

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DSW 266548

STLCOPCB4062554

Monsanto

FROM (NAME & LOCATION): E. T. Mollica

DATE : November 9, 1977 CC:

SUBJECT : PCB PHASE-OUT

REFERENCE :

TO : L. A. Miller

In response to your questions regarding details of the PCB phase out and decontamination program, Bob Pohl has summarized in detail the dismantling, decontamination, and disposal procedure that will be carried out at WGK.

As you will note in Bob Pohl's summary, only the PCB handling portions of the incinerator will be decontaminated and salvaged. The remainder of the incinerator will be retired in place. You will recall that retiring the entire incinerator in place after decontamination was not a viable option since $1M+ would have been required to put the incinerator into conformity with more stringent EPA regulations going into effect in 1978.

The final paragraph of the enclosure describes the plan for the tank car fleet.

E. T. Mollica

Att.

DSW 266549

PCB FACILITIES DECONTAMINATION AND DISMANTLEMENT PROGRAM

With the publication of more stringent proposed EPA PCB's incineration operating guidelines, we opted to avoid major capital expenditures to upgrade the W. G. Krummrich plant incinerator in order to be in EPA compliance by January 1, 1978 by contracting with Rollins Environmental Services of Houston the incineration of some 2.5 million pounds of PCB's before year end. In addition it was to the plant's advantage, if possible, in its relationships with the EPA to eliminate the incineration of PCB's by the time all PCB shipments were completed -- October 31, 1977. PCB's shipments to Rollins commenced in July and will be completed by the end of November. PCB's continued to be incinerated at WGK until the failure of the incinerator in October. The decision not to repair it triggered the decontamination and dismantlement of the PCB handling equipment associated with the incinerator.

Since the termination of PCB production in July, the facilities decontamination program has been underway preparing equipment for dismantlement and disposal. Equipment designated not worth salvaging and/or cannot be decontaminated to meet the EPA PCB's regulations of less than 500 ppm PCB's in the final solvent wash will be buried in an approved toxic landfill located near Sheffield, Ill. owned and operated by Nuclear Engineering Company.

PCB chlorinators and small tanks that cannot be decontaminated will be used as containers to hold small PCB contaminated items such as valves, fittings, gaskets, insulation, etc. These containers will be sealed prior to leaving the plant as well as all PCB piping that cannot be decontaminated. The dismantled facilities will be trucked to the landfill in Nuclear Engineering equipment.

Equipment that can be decontaminated will be available for use within Monsanto in non-finished product services with one exception -- the equipment will not be used in food and fine chemicals manufacture. The salvageable equipment is limited to large raw material and product tanks, stainless steel tower, a few heat exchangers, control room and panel instruments.

The two in-plant PCB waste shuttle tank cars age and condition do not warrant the capital required to rehabilitate them for road service. These two tank cars will be buried in the landfill. The 45 PCB tank car fleet will be decontaminated, all fittings and insulation removed and replaced with new fittings and insulation. The fittings and the insulation will also be buried in the landfill. The only exception to the above tank car plan is 10 to 12 tank cars will replace Luling plant's ammonia nitrate shuttle tank cars between ACL and ammonia nitrate department, which can no longer be economically repaired. These10+ tank cars will only be decontaminated and the fittings and insulation not replaced.

DSW 266550

The refitted decontaminated PCB tank cars will remain in Monsanto service for transporting and/or storage of materials that are not either finished products or materials used in food and fine chemicals manufacture. After the tank cars have been in Monsanto service for five years they will be tested for PCB's to determine whether the tank cars can be sold if no longer needed.

PCB contaminated wash waters from the tank car cleaning operations and/or equipment will either be contract incinerated or the PCB's removed by a carbon bed treatment and the carbon buried in an approved landfill.

RAP
11/3/77

DSW 266551

NEWS

Monsanto

FOR RELEASE

IMMEDIATELY 1976

MONSANTO INDUSTRIAL CHEMICALS CO.
D. R. Bishop
(314) 694-2891

PUBLIC RELATIONS DEPARTMENT
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

PRELIMINARY INFORMATION
FROM ONGOING PCB STUDY
RELEASED BY MONSANTO

ST. LOUIS, Sept. 2 -- Monsanto Company today reported that it has found no cases of either malignant melanoma or pancreatic cancer among current or former employes engaged in the production of polychlorinated biphenyls (PCBs) at its U.S. manufacturing site.

This information, announced by George Roush, M.D., director of the company's medical and environmental health department, was released in response to questions from the news media, prompted by a recent Mobil Oil Corporation study which reported finding three cases of melanoma and two cases of pancreatic cancer among 72 employes who had been exposed to a PCB product while working at a Mobil plant in New Jersey.

Dr. Roush said that if either melanoma or pancreatic cancer were related to PCB exposure as the Mobil report suggested, then it would follow that these malignancies would have also been seen in a worker population over four times as large. "In my opinion," he said, "the fact that we have found no cases of either of these cancers casts strong doubt that the findings of the Mobil study were in fact related to PCB."

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The Monsanto information was based on a review of the records of more than 300 current and former employes who have been identified as having worked in the PCB production unit of the company's William G. Krummrich plant, dating back to 1936 when that unit first became operational. Within this population, Monsanto has been able to identify 50 former employes who have died. A review of death certificates has been included in the work done to date. The Krummrich plant, located just south of East St. Louis at Sauget, Ill., is the sole U.S. manufacturing site for Monsanto-produced PCB products.

Dr. Roush said that this information was extracted from an ongoing epidemiological study that will require another 12 to 18 months to complete. "We would not normally release clinical or medical data from a still-ongoing study," he continued, "without first subjecting it to full scientific investigation and review." He emphasized that, while some facts and tentative findings have surfaced, much additional work needs to be done before a final assessment can be made.

"With these qualifications in mind, and because Monsanto is aware of the obvious concern that has been generated by the Mobil report, the company is releasing the following additional information, some of which I must re-emphasize is very preliminary," Dr. Roush said. "We have not seen a significant excess of cancer in the review of death certificates.

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"The incidence of lung cancer among deceased former employes who worked in the PCB unit during any portion of their Monsanto employment was higher than the rate for the general U.S. population. This study covers a 25 year period and during this time there were seven cases of lung cancer observed in a review of the 50 death certificates compared with 2.7 that would have been expected based on a U.S. male population for the year 1969 compiled by the National Cancer Institute," he said.

Dr. Roush cautioned against trying to reach any firm conclusions from this raw information explaining that it has not even been corrected for age. "This correction factor, alone, could make a significant difference," he added. He also pointed out that every epidemiological study he has ever seen showed an excess in some cause of death because it includes a study of mortality.

"The findings to date may be significant and they may well not be. What is needed now is a controlled study of the lung cancer cases," he said.

"For example, and while it may be difficult to reconstruct, we hope to determine the smoking habits of these workers and, if possible their prior and post Monsanto work experience and exposure. We would also hope to compare this incidence of lung cancer with the lung cancer mortality rate for the East St. Louis area. We do know that three of the seven workers who died of lung cancer, worked in the PCB unit for less than three months. There are a lot of

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things we still don't know and the answers could be extremely significant, especially with a sample this small.

"Another tentative finding we have seen is that our PCB workers lived longer than the national average.

"To date, the evidence developed from this preliminary study would suggest that the cases of lung cancer are not PCB dose-response related," he said. Dr. Roush added that Monsanto's extensive long-term feeding studies with animals would further indicate that PCBs are not carcinogenic.

The Monsanto official said that the study will be transmitted to appropriate Federal agencies and published upon completion.

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NOTE TO EDITORS: Because of increasing environmental concerns, Monsanto announced last January its intentions to voluntarily cease all PCB production, as soon as possible, consistent with the ability of transformer and capacitor manufacturers to convert to viable alternate dielectric fluids.

4 x by 1400 H

Monsanto

FROM (NAME & LOCATION) J. Kenneth Clark - A3NB

DATE June 8, 1977 CC: Mr. J. E. McKee

SUBJECT

REFERENCE

TO Mr. G. F. Barton - B1ND
Mr. D. R. Bishop - C2SC
~~Mr. R. C. Isham - B1ND~~

Joe Nolan has asked Jim and me to comment on the attached. Would appreciate your thoughts ASAP.

Many thanks!

Ken

Ken Clark

JKC:ec

Attachments

DSW 266556

STLCOPCB4062562

Monsanto

FROM (NAME & LOCATION) K. Warren Easley - Washington, D.C. - 1920

DATE : May 25, 1977 cc:

SUBJECT :

REFERENCE :

TO : John Hussey

EPA has proposed a regulation on the labeling and disposal of PCBs. This statement accompanied the proposed regulation. "While we are confident that this regulation will be effective in managing and destroying concentrated sources of PCBs," Costle said, "we face a different and extremely difficult problem in determining how to deal with the 250 million pounds of PCBs -- or one-third of that in service -- which are found in 895 million individual capacitor units widely distributed across the country.

"These PCBs are found in almost every flourescent light fixture and in many small appliances. A regulatory requirement alone is not likely to be very effective in ensuring that they are collected and transported to an incinerator for destruction. But if the assistance of the public is not achieved, these PCBs will probably find their way into the local dump or landfill and from there into the environment. EPA is seeking ideas, and assistance on ways to address this complex problem," he said.

I suggest that Monsanto may be able to develop a worthwhile idea on this end of the problem and that the idea might yield public relations benefits. One idea would be a Monsanto supported program of education beamed at appropriate audiences, including the general public, but more particularly, hardware dealers, electricians, etc., to get people to collect PCB containing articles that had failed. These then could be picked up by the Boy Scouts, perhaps, and brought to collection centers and disposed of in a safe manner. The Boy Scouts would be given a reward of so many dollars per pound, the reward to be paid by Monsanto. Perhaps fire stations could be enlisted to provide collection points.

I suggest this as just one approach. Other and more worthy ideas might be developed. All of them will present problems, of course. (Jack Anderson would say that Monsanto is exposing Boy Scouts to a cancer causing chemical. Well, we can handle that by telling people that if the component is dry, it is safe, if it is leaking, it should be placed in a plastic bag, and so on.)

DSW 266557

We could attempt to enlist the support of equipment manufacturers, perhaps through their trade associations. Additionally, the program could be discussed during the planning stages with activist groups to incorporate their thinking. Some of them, perhaps the League of Women Voters, might even wish to participate.

What I suggest is that Public Relations, in concert with Monsanto's PCB experts, scratch their heads for ideas.

K. Warren Easley

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Attachment

P.S. Attached is a report on the proposed regulation.