

W. B. Papageorge - B2NK

February 1, 1972

OSHA-PCB

H. S. Bergen
G. L. Bratsch - WOK
W. R. Corey
R. E. Kelly

Mr. F. J. Holzapfel

I will attempt to summarize our discussion we had last week during which I expressed my personal concern that the emotions now being associated with PCBs would adversely affect us through an OSHA plant inspection.

In December two incidents occurred which are somewhat related. At a PCB meeting in North Carolina I was approached by a Dr. Powell, a former Monsanto employee and now a chemist with the National Institute of Environmental Health Sciences, who asked if it were possible for government personnel to inspect the PCB producing unit at Sauget, Illinois. I did not commit Monsanto to any visit but informed Dr. Powell we would certainly give serious consideration to a request from a responsible representative of government. He then indicated that he was assigned the task of setting inspection standards for OSHA and was going to recommend that the Monsanto PCB unit be used as a prototype. As yet we have received no formal request to visit the plant.

The December 27, 1971 issue of Air and Water News contains an item referring to PCBs, the Occupational Safety and Health Institute, Monsanto's "easily obtainable health data" and Dr. Terry Davies', Council of Environmental Quality, indication that a health study involving Monsanto's clinical data would be recommended.

It is my understanding that the medical program for our PCB employees is no different than for the other employees at a plant. To date we do not have such basic data as a list of employees who have been involved in the manufacture of PCBs. Since the PCB problem has been of some concern for over three years it seems to me we are extremely vulnerable to severe criticism for not taking any unique action.

I recognize the problems associated with special medical programs but in this instance the "lets do nothing stance" can also lead to serious problems.

You indicated that the W. G. Krummrich plant was ready for a normal OSHA inspection.

MQNS 098213

F. J. Holzapfel

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To better prepare the plant for the inevitable visit we need a recommendation from the Medical Department regarding the appropriate medical action we should take.

I will arrange with Dr. Kelly for a meeting to review our approach.

W. B. Papageorge

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