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FROM: R. S. Nelson - St. Louis CS1H 4-2025

DATE: May 8, 1980

SUBJECT: SALE OF MONSANTO LAND

REFERENCE: Memo, REC to RSN, 4/29/80

TO: R. E. Cummings - 1410

cc: C. F. Callis - B2SA
F. J. Holzapfel - B2SC
G. L. Jessee - C2SA
R. L. Liss - CS1H
J. H. Waldbeser - CS1H
B. W. Wilken - G5NJ

The Corporate Environmental Policy regarding the sale or transfer of ownership of Monsanto-owned land is as follows:

> "Retain ownership of all company land known to contain wastes of such composition and quantity which have the potential for injury to health or the environment except where otherwise approved by the Environmental Policy Committee."

To comply with the policy I would suggest that you check with the "long-timers" and retirees concerning their recollection of any waste buried on the plot of land you propose selling. Any available waste disposal records for this area would be an even greater help.

It is my understanding that you have or had one or more monitoring wells on this plot of land. Data obtained from these wells should be correlated. If insufficient sampling or well monitoring has been done in keeping with what is believed to be buried but not confirmed, additional probing would be in order.

Bob, the main concern is that you know as much as required about the past history of this site as possible, but within reason. If it is your decision, based upon the findings, that material classified as toxic or hazardous has been buried and is still present on this property, we will be glad to give you our opinion of the direction you should take. I know that everybody agrees that we do not want to chance another Woburn incident.

R. S. Nelson

jb
enclosure

MCD 6046206

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PLAINTIFF'S EXHIBIT 29