Aroclor SF

Monsanto

FROM (NAME & LOCATION): H. S. Bergen - B2SL

DATE: October 15, 1975

SUBJECT: Monsanto Meeting - October 15
National Symposium on PCBs
Chicago, Illinois
November 19-21, 1975

REFERENCE:

TO: F I L E

cc: D. R. Bishop - B1ND
F. J. Fitzgerald - B3SA
T. L. Gossage
R. E. Keller - T1B
G. J. Levinskas - A2SA
J. P. Mieure - T2F
W. B. Papageorge
C. Paton
R. G. Potter - B3SA
W. R. Richard - T3A
Dr. G. Roush - A2SA
J. R. Savage
W. W. Withers
D. Wood

The following people attended subject Monsanto meeting:

H. S. Bergen
D. R. Bishop
T. L. Gossage
R. E. Keller
G. J. Levinskas
W. B. Papageorge
C. Paton
W. R. Richard
Dr. G. Roush
J. R. Savage
W. W. Withers
D. Wood

RESULT

The result Monsanto is desirous of achieving by participating in this National Conference is to secure a favorable image as being responsive to the needs of society. Specifically, we decided to be on the program; to talk to those things that we have facts and data on; not to be overly defensive, but positive and cooperative.

TENTATIVE CONFERENCE AGENDA AND MONSANTO PARTICIPATION & ACTION PLAN

Bill Papageorge passed out the EPA tentative agenda for the Conference (Attachment A).

Bill Papageorge indicated that EPA does not want this to be a Monsanto meeting and that while we are expected to participate, they don't want to see us try to dominate. We agreed that we should speak up to four issues where we can contribute facts and Bill Papageorge will try to get EPA to include these items on the agenda. These four items where we agreed to present papers and the individuals responsible are as follows:

Paper No. 1 - Health and Toxicology - Dr. G. Roush (Dr. Roush to decide who authors and presents)

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Paper No. 2 - PCB Uses, Sources and Identifications - a paper to be prepared by W. B. Papageorge and J. P. Mieure

Paper No. 3 - Alternative Materials and Economics - D. Wood (with necessary inputs from R&D and customers)

Paper No. 4 - Approaches to Control - W. B. Papageorge

We agreed that we should shoot for a 20-25 minute presentation time on each paper and there probably will be allowed 5-10 minutes for open discussion.

The first drafts of the papers are due by November 3 to Bill Papageorge who will coordinate the paper presentations, internal approvals and coordinate with EPA. The final drafts are due November 10.

Mr. Dan Bishop will handle slide preparations and all requests for slides should be sent to him. A minimum of five days is required for slide preparation so these must be submitted no later than November 10.

Dan Bishop will be chairman of all public relations aspects as well as reviewing our questions and answers information and anticipating any further questions that may come up and seeing that we develop approved answers by November 10.

In addition, Dan Bishop, David Wood and Bill Papageorge will outline the guidelines and procedures by November 10 for how Monsanto personnel will conduct themselves during the conference. In general, we will adopt a "low profile" tone and attitude.

David Wood was assigned the job of logistics, coordinating hotel accommodations, and people attendance.

Final strategy meeting will be held on November 11 at 8:30 a.m. in Conference Room A-303. All who attended this meeting are requested to be present, as well as all authors and those designated to attend.

BASIC STRATEGY

From Bill Papageorge's information, as well as the proposed tentative agenda from the EPA, it appears that the EPA strategy is to portray PCBs as being harmful to wildlife and human health and a potential carcinogen. They will then identify the various uses and sources and prove that PCBs are persistent in the environment and causing various ecological and damaging effects. They will then attempt to show there are other alternative materials and it's only a matter of economics to convert. The evening session will be to whip up emotion from the public and the activists on how bad the situation is and the need for control. The final session will be an approach to control where various alternatives may be considered, such as: (a) total ban; (b) combination of partial ban and very tight control and (c) the need for a Toxic Substances Act.

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We agreed that the basic Monsanto strategy would be that Monsanto is responsive to the needs of society, that our past actions have demonstrated this and that our future actions will continue to demonstrate this. That Monsanto will offer facts and speak from strengths of knowledge and defer to others who are more knowledgeable in their areas of expertise. We agreed that one of our weakest areas was on the subject of the presence of PCBs in the environment and various ecological effects. We may have statements to make on some of these areas which should be brief and concise and Dan Bishop and his committee will consider these areas. We agreed that Bill Papageorge would contact the Electronics Industry Association (EIA) and our various customers, as well as other trade associations (NEMA, ASTM) to get them to speak on the program on the benefits of PCBs, the economic trade-offs and performance trade-offs versus other materials and the economic impact of a PCB ban. They should also speak to the detailed time and testing requirements for a replacement dielectric fluid for capacitor and transformer uses. They will also want to talk to their efforts to "control" PCBs.

In the paper on Health and Toxicology, Dr. Roush and his group will consider the information we can present on Monsanto's plant workers' health and safety based on 40 years manufacturing experience, as well as toxicity of Aroclors and, particularly, the epidemiological studies and the two-year feeding studies on various animals, as well as Dr. Shubik et al opinion on the Industrial Bio-Test work and any comments/observations regarding the Kimbrough work.

In the paper on PCB Uses, Sources and Identifications, this paper should include Monsanto policies and procedures on handling PCBs, the different PCBs made, the types of testing required for a suitable dielectric fluid, our comments on analytical techniques and an in-depth discussion of the biodegradation characteristics of the various isomers based on Monsanto data, as well as the tissue residue studies with references to outsider's published works showing PCBs in the environment have declined.

In the paper on Alternative Materials and Economics, we will be presenting for the first time to the EPA and the public the results of some 3-4 years of experimentation on Monsanto's part and with customers on PCB replacement products in capacitors. The theme to be that we still do not have a replacement fluid as fire resistant as PCBs and with all the other desirable electrical performance characteristics. We do have proposed alternatives which perform in like manner, are more environmentally acceptable, but are not fire resistant. Detailed description will be made of our replacement products, along with an indication of our production/development timetable.

The paper on Approaches to Control, Monsanto will state positively what we have done to control PCBs, particularly our voluntary control, reduction of production, in-plant control, working with the EIA and customers on control, and working with the EPA on proposed legislation and our recommendations.

H. S. Bergen

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Attachment

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