

St. Louis - General Offices

April 9, 1970

PCB'S MANAGEMENT PLAN

H. S. Bergen ✓
C. J. Smith
J. E. Springgate

Mr. W. B. Papageorge

I have read your revised plan dated April 7 and while I think this is okay as a working document, I do not think it will satisfy the CMC. In my opinion we need to take a much more aggressive attitude to this subject otherwise we will find ourselves directed to a course of action which may not be in the Division's best interest.

As I will have little opportunity to see you before our review with T. K. Smith and Howard Minckler on Friday afternoon, I am setting below my ideas on how we should approach this matter.

1. Open the review by referring to the previous presentation to the CMC highlighting particularly their direction that we should prepare a plan to discontinue the manufacture of 1254 and 1260.
2. Confirm that pollution hysteria continues to grow and that we are probably moving into a stage where government agencies as well as independent workers will become involved.
3. Highlight that we want to bring them up to date on all the latest developments, the progress we have made to date and the need for a modification in our strategy.
4. List major developments:
 - a. Continuing work and reports published by independent workers -- reference to Risebrough discussions.
 - b. Identification of PCB's in cow's milk in Ohio (refer to the fact that so far our own analytical work has not confirmed these results).
 - c. Refer to probable intervention of FDA to fix minimum levels of PCB's in food stuffs.
 - d. Briefly report on meeting with Federal Water Pollution authorities.
 - e. Describe increasing concern in the U.K. and intervention of Ministry of Agriculture, Fisheries and Food.
 - f. More awareness of the problem by German, French and Italian producers and their willingness to cooperate and carry out the necessary work.

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- g. Emphasize the strong reaction we received from General Electric when we indicated intention to discontinue manufacture of 1254 and 1260. Take the opportunity of impressing on the CMC the need for balance, i.e. one safety factor against another.
 - h. Summarize that all of this adds up to the fact that we are currently very much on the defensive and there is a need for more rapid, positive and aggressive action.
5. Report on the progress we have made to date. Wherever possible indicate factual achievements:
- a. Report on progress to control emissions from our own plants, defining long- and short-term targets and report by plant what has been achieved so far. If we need capital we should ask for it.
 - b. Control of emissions from customers' plants. Emphasize that this must be handled by a combination of effective control of emissions (for example, transformers), discontinuation of sales where it will be impossible to effectively control emissions (pesticide uses, coatings, adhesives) or replacement of existing Aroclors by non-persistent, non-toxic alternatives (NCR usage) via degradation where this is possible.
6. Review major end use areas indicating progress to date and actions we intend to take in the near future to establish the fact that we are taking a responsible attitude to this problem and are moving rapidly to reduce pollution of the environment.
7. Report on toxicity work in hand, emphasizing that based on information available to date, the Aroclors are only mildly toxic and that this is unlikely to be a significant factor in their usage being banned or restricted.
8. Analytical procedures emphasize good progress to date and the aim here is to become internationally recognized as experts in this area so that our results will be accepted.
9. Bio-degradation - report on progress to date and indicate chances of success in this area.
10. Summarize by requesting that we be allowed to implement the plan as presented to the CMC and particularly that they agree to the modification in the strategy, emphasizing that at this stage there is no point in discontinuing the manufacture of 1254 and 1260, and

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Mr. W. B. Papageorge

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that restriction of their uses is far more likely to get us off the hook and enable us to maintain maximum profitability while preserving a responsible image as a company.



JOHN MASON

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