Monsanto

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DATE : July 8, 1982

SUBJECT : R. G. KALEY -- PCB ISSUES ASSISTANCE

REFERENCE :

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I want to take this opportunity to tell you of the very valuable assistance that Dr. Bob Kaley has provided to the Corporate PCB Issues Management group during the past 12 to 15 months and to thank you for your patience and understanding in allowing Bob to participate actively in these areas involving litigation and future TSCA regulation so critical to Corporate Monsanto.

I know in the near future mid-year goals will be reviewed in various departments, and I certainly want to recognize Dr. Kaley's outstanding performance in this critical area.

Dr. Kaley has represented Monsanto on the Chemical Manufacturers Association (CMA) PCB Analytical Task Force involved in the current litigation between EDF and EPA over the TSCA PCB rules. He has made significant contribution to the technical review of proposed new PCB regulations that hinge on scientific analytical issues. He is recognized both by the industry association and the Federal EPA for his analytical expertise, general knowledge and practical sense, and has helped immeasurably in discussions and negotiation in scientific/"legalese" areas.

His contributions and stature were recognized in May by EPA when he was asked to chair one of seven major sessions at the EPA sponsored symposium - "Recent Advances in Exposure, Health and Environmental Effects Studies of PCB's." This two-day symposium, held at Bethesda, Maryland, brought together 200 scientists worldwide to review key PCB issues, including analytical chemistry. The conclusions and data of the symposium will be used as evidence in the EPA rulemakings being held under the DC Circuit Court mandate.

Evidentiary hearings on the second of three new proposed PCB regulations will be held in Washington July 26 and 27; a key issue will be analytical issues and technology for quantifiability, compliance and enforcement of the new PCB rules. Dr. Kaley has been requested by the CMA outside counsel and the CMA PCB Special Projects Group to appear at the hearing and testify on behalf of the chemical industry

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and association. I have asked Dr. Kaley to take on this task as Monsanto's representative on the CMA Special Panel and he has agreed to testify.

Dr. Kaley has worked many additional hours and weekends on the PCB issues project over the past year, including consulting for Monsanto Corporate Law Department in several pending litigations, as well as the EPA regulatory front. He has performed exceptionally well. He is a very credible scientist, articulate and an excellent leader. Please recognize these contributions and performance in his Results/Goals Reviews.

Note: The PCB Issues discussed above will continue for the foreseeable future and the PCB Issues Management Team will need to use Dr. Kaley's expertise, articulation and powers of persuasion many times more until some of these critical problems are resolved.

John Craddock

J. H. Craddock

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