onsanto

file PCB post phase out

M (NAME & LOCATION) E. T. Mollica

November 10, 1977

cc: L. A. Miller
J. T. Nolan - DlA
D. Wood
J. C. Weber
R. C. Isham
R. A. Stohr

JECT : PCB

ERENCE : FJF/LAM 4 Nov. 1977

: F. J. Fitzgerald

In response to the question of what initiative Monsanto will undertake to clean up PCBs for the environment, raised by Mr. Hanley at the budget review, a meeting was held with Bob Isham, George Levinskas, Anna Navarro, Dick Stohr and David Wood to define Monsanto's position and response.

The basic Monsanto position has two aspects:

1. Monsanto has acted in a socially responsible manner in recognizing the hazard with PCBs, in voluntarily terminating production, co-operating with state and federal agencies, supplying requested data, and in plans for dismantling, decontamination and disposal of the production facilities.

2. Monsanto has no plans to initiate programs to physically remove PCBs from the environment. While the issue of clean-up has been raised by authorities in Alabama (our PCB unit), Illinois (Outboard Marine), Indiana (Westinghouse) and New York (G.E.), there are no federal laws or EPA regulations requiring clean-up from waterways. Monsanto has no intention of independently setting such a precedent. Further, there is no known technology for physically removing PCBs from lakes, streams, and rivers that will assure complete removal. The EPA has proposed regulations for disposal of solid waste (i.e. capacitors) containing PCBs, but we have no plans to underwrite the costs of that program.

These points are the basic parameters of an appropriate response. I have asked Bob Isham to develop several scenarios of answers in dialogue form which can be forwarded for Mr. Hanley's use. This can be accomplished within your thirty days deadline, i.e. by 2 December.

E. T. Mollica

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file Start PCB Post Phase Out

PCB POST PHASE OUT

DISCUSSION PAPER

11/2/77

1. Sales and distribution ceased October 31, 1977.

2. Plant will be dismantled and disposed of in 1978 first quarter.

3. Railcars will be decontaminated and in non FP service by September 1978.

4. Monsanto in house PCB equipment program implemented.

5. Samples stored for bona fide legal or environmental testing needs. One lab supply house established with supply for environmental test purposes.

6. 2 year primate feeding study underway (27 weeks) to review work of Dr. Allen Wisconsin.

7. WGK incinerator to be retired in 1977.

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ONGOING ISSUES

1. Fate of residual PCB's in water/soil.
2. Level in fish - impact on commercial/sports fishing.
3. Methods of accelerating elimination of PCB from biosphere.
4. Confirmation of hazard of PCB's to health (human)
5. Fate of PCB in existing electrical equipment - how to easily detect minor escapes from "sealed" equipment - transformers.
6. Safe disposal of on going PCB solid wastes. Incineration of other forms Contact EPA Regions
7. Responding to public concerns on PCB.
8. On going litigation relating to previous PCB exposures.
9. International disposal of PCB
10. Others.

In which areas should Monsanto sustain either direct or indirect support?

.1 Liquid leachate
.2 Cancer.
13 Cement Kiln
14 IBT Tests
15 Epidemiological Study at WGK
16 Monitoring employee health Prospective Reconstruct Animals EUROPE
17 Silos

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