Monsanto

FROM (NAME & LOCATION): David Wood-St. Louis-B2SD

DATE: November 5, 1976 CC:

SUBJECT: EIA OBJECTIONS TO EPA 307(a) PROPOSALS

REFERENCE:

TO: W. W. Withers
D. Bishop
J. C. Weber
C. Paton

Covington and Burling, EIA's Counsel, have sent me copies of affidavits supporting the EIA objections to the proposed 307(a) regulations. There are a number of statements which may impact Monsanto.

1. John Hutzler, Vice President Engineering of Aerovox declares that they will purchase Aroclor 1016 from Monsanto to satisfy their needs into the 2nd quarter of 1978 so that they will not need to use any PCB other than Aroclor 1016. He further acknowledges that Monsanto has agreed to make its railcar fleet available as interim storage (pp 9-10 Hutzler attached).

2. Roy Clark, V. P. and General Manager of UMC covers the same ground (pp 10-11 Clark attached).

3. Note that Messrs. Hutzler and Clark will probably be cross-examined November 15 or 16.

   We may wish to prepare a statement to cover any criticism of this inventory position which may receive adverse comment from Environment Defense Fund and NRDC in cross-examination.

Dan, if you need my help, please call.

David Wood

/deb
Attachments

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