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ON
NAME-LOCATION-PHONE: Don B. Edwards - B3SD - General Offices

TE	:	March 19, 1979	cc:	D.C. Armstrong	-	1740
				F.B. Matthews	-	1740
SUBJECT	:	<u>TCDD IN CHLOROPHENOLS</u>		J.C. McPhillips	-	B3SC
				J.S. Metcalf	-	B2NK
REFERENCE	:			D.E. Munie	-	B3SB
				D.P. Roman	-	N2B
○	:	J. D. Wilson - N3A		P.A. Tierney	-	N3A

I believe the question of the presence of tetra-chlorodibenzo dioxin in the chlorophenols and Santophen I is of very high importance to the continuation of the product line. Any dioxins present in Santophen I may be sufficient to discourage a customer even though it does not present any health hazard.

During the sampling and analytical work that is being done, it would be appropriate for you and your group to work with Dave Metherd and Dallas Armstrong to modify the chlorophenol process in such a way as to not make dioxins if possible. Eliminating the caustic sounds like an easy solution, but it must be accompanied by the total elimination of water, which may not be so easy.

Even if you are totally successful in reducing dioxin to a non-detectable level, it still doesn't leave us in a totally comfortable position. First, as far as I know, we haven't decided what level we can tolerate, legally, without notifying the EPA and our customers. Second, with analytical techniques continually improving, how long is it before we analyze at the .01 ppt level. Third, what isomer are we really dealing with, and fourth, is Monsanto politically ready to tolerate the 2,3,7,8 isomer at any level. We move Santophen I in tank cars and trucks. What happens when a spill is analyzed by the EPA at 5 ppt?

Don B. Edwards
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Protective Order