Monsanto

FROM (LOCATION) H.A. VODDEN - RUABON.

DATE : 11th August, 1971.

SUBJECT : POND EXPERIMENT.

REFERENCE : HAV/bjo'g.

TO : R.A. BAXTER - RUABON.

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(1) Pond Experiment

At the Specialty Products meeting in Newport on 22 July it was suggested that we should explore the possibility of persuading outside organisations to establish the feasibility of pond experiments for testing PCB products against environmental accumulation. It was thought that an independent assessment of the credibility of such tests would make acceptance by regulatory authorities more likely, and, of course, the cost-saving element of the exercise could reduce Monsanto's expenditure in such work quite considerably.

Since the Newport meeting I have discussed the "pond experiment" concept with Ian Prestt, the deputy director of the Central Unit on Environmental Pollution of the Ministry of the Environment. He is quite enthusiastic that the idea is basically sound and considers that it offers good scope for demonstrating "environmental acceptance". He also maintains that the results of such experiments, carried out by a responsible organisation like Monsanto, would be accepted fully by the UK authorities. He does not think that laboratories under UK Government control would agree to develop such test methods, however, but sees no difficulty in organising discussions with appropriate experts to define the necessary conditions for carrying out the experiments. In fact he has offered to use his official position to do this if we so wish.

We have also heard that there is a possibility of Jensen visiting the U.K. in September to participate in the next PCB Discussion Group meeting at Chelsea on 17 September. This may give us an opportunity to further our discussions with the National Swedish Environment Protection Board and I have initiated some enquiries about this.

My own view, which is not based on a very thorough study of the subject, is that the main cost of the project is likely to be the analytical work involved. If we could arrive at statistically significant results by analyses of, say, 10 fish at monthly intervals we would probably need about 50 fish (say carp) per pond. I envisage that four or five ponds would enable a blank control, a "product" experiment and two standards like DDT or Aroclor 1254 to be included. These ponds need not be particularly large. A hemispherical pond of radius 3 feet could support about 50 fish each of 6 inches length. The details of such work would need some discussion with experts before starting, but I would hope that the pond itself could be treated as a "black box" and that the only critical measurements necessary would be on the fish. The product under test could, I think, be introduced as an "excess source" the limited solubility serving to control the rate of entry into the pond. Some observation of the ponds would be necessary to ensure that they were in good condition, but I do not think this would present any great problems.

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