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BIOLOGICAL CONSULTANTS

Water Pollution · Water Quality · Biological Surveys · Fishery Biology

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January 23, 1973

Dr. W. R. Richard
Monsanto Company
St. Louis, Missouri

Dear Dr. Richard:

For the past several years Dr. Royal D. Suttkus and I have conducted a biological survey of the Coosa River, Logan Martin Reservoir, Choccolocco Creek, and tributaries for Monsanto Company. Presently we are working directly with Mr. J. T. Bell of Monsanto Company. Mr. Bell has informed us that approval has not been granted for continuation of the survey, hence I would like to discuss the matter with you since Mr. Bell has indicated that you would be the appropriate person to contact.

I am enclosing a document entitled, "Request for Renewal of Contract dated November 5, 1970, between Monsanto Company and Biological Consultants: Dr. R. D. Suttkus and Dr. G. E. Gunning." As consultants we recommended that our contract be extended for one additional year in order that we may learn whether or not there will be a decrease in P.C.B. residues in the fishes of Choccolocco Creek and the Coosa River. Since completion of the above document we have received residue data for the March, 1972 and June, 1972 collecting trips. These data have been examined and I have communicated with Mr. Bell in this connection. Mr. Donald Turner, Monsanto Company, Anniston, Alabama, is presently working up the residue data for the last sample of fishes we collected from the ten stations on Choccolocco Creek, Logan Martin Reservoir, Coosa River, and tributaries. This sample of fishes was collected during September, 1972. For seven of the eight trips we made, P.C.B. residues were still being released at Anniston into Choccolocco Creek. Only the eighth trip, September, 1972, will yield data for fishes that were not being exposed directly to P.C.B's from the plant effluent, although they are of course in the environment which has considerable levels in the sediments and in the various organisms that fishes feed upon.

Viewing the survey from the standpoint of Monsanto Company, you are at the crossroads so to speak since it is the September, 1972 and any subsequent trips that will indicate whether or not there is an immediate drop in residue levels of P.C.B's subsequent to curtailment of effluent discharge of P.C.B's from the Anniston Plant.

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Our contention is that the present situation at Anniston needs to be studied by Monsanto Company. Obviously Dr. Suttkus and I feel that we are in the best position to collect and identify the fishes, and further that Mr. Bell and Mr. Turner are in the best position to analyze the fishes for P.C.B. residue levels since they have been handling the materials in a thorough and professional manner. An examination of the data for P.C.B. residues supplied Messrs. Bell and Turner will show the good job they have done in working with us on this project.

In all candor I must state categorically that it is in the best interests of Monsanto Company to continue the study as outlined in our proposal, whether we do it or not.

Thank you for your consideration.

Very truly yours,

Gerald E. Gunning

Gerald E. Gunning, Ph.D.
Biological Consultant

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Enclosure

Request for Renewal of Contract dated November 5, 1970, between Monsanto Company and Biological Consultants: Dr. R. D. Suttkus and Dr. G. E. Gunning

Introduction:

For the past two years consultants have conducted a biological survey of the streams affected by Monsanto Company discharge at Anniston, Alabama: Choccolocco Creek, Coosa River, Logan Martin Reservoir, and various tributaries of these. The survey has actually consisted of two separate but related parts: 1) An ichthyological survey of these waters designed to determine species composition and relative abundance of the various fishes present with a view toward ascertaining any possible effects the Monsanto effluent might have on the fish populations, and 2) A residue analysis conducted by Monsanto Company using fishes from ten (10) stations supplied by consultants. Consultants have interpreted the residue findings on a trip-by-trip basis during the first two years of the present contract as they are available from Monsanto Company employees. We have worked rather closely with Mr. J. T. Bell and Mr. Donald Turner of the Anniston plant, and previously with Mr. Wright before he left Monsanto Company.

Background:

Consultants have found a rather large number of deformed fishes below the point of effluent discharge, as well as many fishes that are hemorrhaging or exhibiting various degrees of nervous system damage. These instances have been reported to Monsanto regularly. Since these fishes are found in parts of the stream that are characterized by high P.C.B. levels, one must admit the possibility that debilitation is due directly to P.C.B's or other products manufactured by Monsanto.

Analysis of five sets of data for trips made during December, 1970; March, 1971; June, 1971; September, 1971; and December, 1971 have shown that there has been no decrease in P.C.B. levels during this time, that is to say the levels within a given species of fish have remained fairly constant. Mr. Turner is presently doing the analyses for the March, 1972 survey and has in his possession the fishes for the June and September trips as well. Other work at the plant caused this delay which will be rectified by the end of December, 1972 (personal communication with Mr. Bell and Mr. Turner).

The release of P.C.B. effluent in some form, or to some degree, has been such that the first trip for the collection of fishes that should be free of P.C.B. effluent discharge was made in September, 1972. This is the last trip in our present contract, hence this request for a renewal.

Proposal for Additional Work:

As consultants we recommend that the contract be extended for one additional year in order that we may learn whether or not there will be a decrease in P.C.B. residues in the fishes of Choccolocco Creek and the Coosa River. It is imperative that residue analyses be made for at least two survey trips in order to determine whether or not the curtailment of P.C.B. release is reflected in the fish residue levels. The ichthyological survey (two trips) would be continued in its present form in order to monitor species composition and relative abundance of the various fish species as in the past two years of the survey. A study of the frequency of deformities and other abnormalities would be included as an integral part of the ichthyological survey as well.

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Cost of Renewal Contract:

Trip 1 March, 1973

Dr. Suttkus--$1,800; Dr. Gunning--$1,800; 2 students--$400 total, i.e. $200 each per trip; jar allowance for year--$250.

Grand total of $4,250 for Trip 1

Trip 2 September, 1973

Dr. Suttkus--$1,800; Dr. Gunning--$1,800; 2 students--$400 total.
Grand total of $4,000 for Trip 2

Hence, total cost of survey for one year would be $8,250 plus expenses, i.e. vehicle travel of 10¢ per mile and actual motel expense for the four men (see original contract).

(Signed) _____

Gerald E. Gunning, Ph.D.
Biological Consultant

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