SPECIALTY CHEMICALS DIVISION

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
Phone: (314) 694-1000

September 22, 1976

Mr. Steven S. Rosenthal
Covington and Burling
888 Sixteenth Street, N.W.
Washington, D. C. 20006

Dear Steve:

Rich Rollins asked if we could prepare comment on the section of the Criteria Document, Appendix E, Metabolism and Biodegradation with specific reference to the comments made about Monsanto research work in Paragraph 1 and 2 on Page E4.

Messrs. Tucker and Saeger have reviewed the referenced section. The last sentences of both Paragraph 1 and 2 of E4 are incorrect. Supernatant samples were not analyzed as stated and there was no mistaking PCB removal to sludge for degradation.

-"No where in our paper do we state that only the supernate was analyzed. Instead, we clearly spell out that we sampled the mixed liquor (bacterial sludge + supernate; see last Paragraph, Page 707 and 4th Paragraph of Page 708).

-In the 2nd Paragraph of Page 709, we describe two experiments that demonstrate that our extraction procedure quantitatively removes PCBs from the mixed liquor."

If one excludes the interjected comments on Tucker and Saeger's paper, the remainder of the section is basically a review of a compilation of PCB degradation studies which

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by-and-large support in fact that lower chlorinated materials are more readily degradable than higher chlorinated homologs.

Yours sincerely,

David Wood
Manager
Dielectric Fluids

/deb

cc: Roger Wills
Richard L. Rollins

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