H. S. Bergen - B2SL

November 14, 1973

W. R. Richard - T3A
W. B. Papageorge - B1NA
R. E. Keller - T1B
C. W. Roos

REQUEST FOR RELEASE OF PUBLICATIONS:
1) MIGRATION OF POLYCHLORINATED BIPHENYLS IN SOIL INDUCED BY PERCOLATING WATER, AND,
2) BIODEGRADATION OF POLYCHLORINATED BIPHENYLS

TO: E. S. Tucker
T2F

I am in agreement with the publication of both of these articles and feel that they will be of considerable benefit to the understanding of the polychlorinated biphenyl issue.

I do have the following suggested changes which I think will be beneficial.

Migration of Polychlorinated Biphenyls in Soil Induced by Percolating Water

I would rewrite the first paragraph of the introduction because as written it indicates to strongly a unilateral decision by Monsanto and raises the question of the continuing viability of the dielectric fluids business.

I feel that this should be reworded somewhat as follows: "In accordance with the U.S. Government Task Report on polychlorinated biphenyls with regards to the necessity of retaining Aroclor products for use in closed systems such as capacitors and transformers because of no suitable replacement products, Monsanto restricted sales to these closed systems and set up a high temperature incinerator for disposal of the used fluids."

Everything else appears satisfactory.

Biodegradation of Polychlorinated Biphenyls

In the last sentence of the third paragraph on the first page in the introduction it is stated "---it must be remembered that PCB's are not a single entity, but complex mixtures made up of many entities which can and do degrade at different rates." Since to make this a statement of fact

without the evidence to support that they "can and do degrade", I would suggest that since this is an introduction to a subject that we want to prove that the products do degrade, that we reword the sentence, "---it must be remembered that polychlorinated biphenyls are not a single entity but complex mixtures made up of many entities which may have different rates of susceptibility to biological degradation."

The balance of the paper is OK.

H. S. Bergen

HSB:pp

MONS 028990