

Monsanto

LAW DEPARTMENT

MAY 16 1979

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TSCA Section 8(e) Evaluation--
2,4 Chlorophenol

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TO Memorandum to File

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SUBJECT TO PROTECTIVE ORDER.

On May 11, 1979, the above-named persons and the undersigned met to consider whether an immediate notification to the Administrator of the EPA, pursuant to Section 8(e) of the Toxic Substances Control Act, is required with respect to chlorophenol.

The April 20, 1979 issue of the Federal Register, at 44 FR 23582, indicated that copies of a report, "Bioassay of 2,4,6-Trichlorophenol for Possible Carcinogenicity (T.R. 155)" were available at the National Institute of Health. The notice stated that the study concluded that ". . . under the conditions of this bioassay, 2,4,6-trichlorophenol was carcinogenic in male F344 rats, inducing lymphomas or leukemias. The test chemical was also carcinogenic in both sexes of B6C3F1 mice, inducing hepatocellular carcinomas or adenomas."

It was pointed out that Monsanto's technical (93%) 2,4-dichlorophenol, at the present time, contains 1-4% 2,4,6-trichlorophenol. This product is sold to five customers. To the best of Monsanto's knowledge, this product has been manufactured and used in the United States for at least 40 years, with no known adverse effects on health or the environment. A project is underway to improve the purity of the product to 97% 2,4-dichlorophenol. This will reduce the contained 2,4,6-trichlorophenol to less than 100 ppm. ^{at least} ^{based on limited experimentation} This \$5,000,000 project is expected to be completed in October 1979. ^{November}

Since the product has been used for a number of years with no known harm to health or the environment, it was felt that the Federal Register notice did not contain sufficient information to indicate a substantial risk of injury to health or the environment, or to warrant other precipitous action. Dr. Roush was requested to obtain a copy of the report and report to the group after having reviewed it.

It was mentioned that the product (93% 2,4-dichlorophenol) may contain monochlorodioxin, dichlorodioxin, trichlorodioxin and tetrachlorodibenzodioxin in trace amounts. After a process change (elimination of caustic) completed in April 1979, the product contains no detectable dioxin (at a detection level of 10-20 ppb). In view of the relatively long experience in manufacturing and using this product with no known adverse effects, it is not felt that this information indicates a substantial risk of injury to health or the environment.

A waste material generated when the product is produced, described as chlorophenol still bottoms, contains all eight chlorodibenzo-dioxins in concentrations varying from 0.1 to 1,000 ppm. Disposal of this material has been accomplished in the past by 200-fold dilution with non-dioxin containing residues, and shipment to Baton Rouge, Louisiana or Deer Park, Texas for destruction by high temperature incineration. This method of disposal is being evaluated to determine its continued viability.

In summary, it was concluded that, since none of the information evaluated reasonably supports the conclusion that 2,4-dichlorophenol presents a substantial risk of injury to health or the environment, no notification to the EPA is necessary. ~~Dr. Roush will report to the group after he has reviewed the NIH report on the 2,4,6-tri-chlorophenol test.~~

However, the Group will reconvene for further consideration of the issues ~~if~~ after Dr. Roush has had the opportunity to study the report on trichlorophenol and/or if additional ~~to~~ information becomes available.

Phocion S. Park

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