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EUGENE N. CRAMER
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TELEPHONE
213 572 2784

January 18, 1972

Dr. William R. Richards
Research Group
Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

Dear Dr. Richards:

As indicated in our telephone conversation January 14, I would appreciate your advising me as to whether Monsanto polychlorinated biphenols used in power capacitors (arochlor 1254 and 1216, and the newer MCS-1016) are persistent chlorinated hydrocarbons within the meaning of Section 18 of the enclosed legislation. I agree that there is some doubt as to the meaning of the phrase "Any form of persistent chlorinated hydrocarbons" which can only be determined through legal means, but I am interested in obtaining your professional opinion as to whether any of the listed persistent chlorinated hydrocarbons in Subsection 10477 are such close chemical kin to any PCB that it requires no great stretch of imagination to deem them "any form of persistent chlorinated hydrocarbons."

In addition, I am very desirous of obtaining such copies of your research reports, application data bulletins, or professional society papers as relate to the development of this modified biodegradable PCB called MCS-1016. Inasmuch as this initiative will be placed before the people in June, you can see our concern to obtain rapidly factual information as to this material.

Very truly yours,

Eugene N. Cramer

Enclosure

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