cc: R. L. Rollins
R. Wills
D. Wood

Monsanto

SPECIALTY CHEMICALS DIVISION

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September 13, 1976

EPA 307 a

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

Dear Mr. Rosenthal:

Per Dick Rollins' request of August 30th, enclosed are our critiques of Dr. Veith's and Dr. Munson's affidavits relating to the sampling and analysis of trace quantities of PCBs. Also enclosed is a copy of our critique of the analytical methodology specified in the proposed EPA regulation 307(a).

In reviewing these documents, there is one very important item that has been glossed over by the EPA and also in Dr. Veith's and Dr. Munson's affidavits. The EPA in their proposed regulations try to overcome the questions and problems in measuring trace concentrations of PCBs by increasing the sample size. This sounds logical but in real life situations, you are not dealing with just PCBs and water but other trace impurities which interfere in the analysis. As you increase the micrograms of PCBs by increasing the sample size, you also increase the concentration of the interfering materials. It is equally difficult, therefore, to quantify the PCBs present no matter what sample size is used, because the background from the interfering materials has been increased proportionately.

Another comment which may be explored is on page 2 of our critique of Dr. Veith's testimony, "The whole concept . . ." We do not have any "hard" data to back up our statement "Laboratory bioconcentration values may be higher than environmental values," but this view is shared by others.

I hope that these comments will help your case.

Sincerely,

J. Coleman Weber

J. Coleman Weber
Manager
Product Acceptability

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Enclosures