Monsanto

FROM (NAME & LOCATION): E. G. Wright - Anniston, Alabama

DATE: September 16, 1970

J. T. Bell
E. S. Tucker - So. 2nd St.

SUBJECT: ANSWERS TO QUESTIONS CONCERNING FDA DATA ON CHOCCOLOCCO CREEK FISH

REFERENCE:

TO : J. C. Landwehr

On 9/14/70, I discussed the questions which you raised concerning PCB levels which the FDA reported for Choccolocco Creek fish. These questions were discussed with Dr. Tucker and a general summary of his answers along with the questions is listed below.

Questions:

1. Are any metabolites of DDT showing up as PCB?

   ans.: Yes, some peaks of DDT metabolites do overlap some PCB peaks, however, different columns can be used to separate these two components.

2. Do DDT, TDE, DDE, etc. peaks reinforce the PCB peaks, therefore making it higher?

   ans.: Yes, some do reinforce but again some separate columns can be used to resolve all components.

3. Can he explain fact that the trend in total components and PCB are together?

   ans.: The length of time which fish are exposed to polluted water will probably explain the increase in PCB concentrations with relationship to the increase in DDT, TDE, DDE, etc.

4. Are these analysis typical of other analysis from a stream similar to Choccolocco Creek?

   ans.: These levels are typical of the Mississippi River, however, PCB levels in Mississippi River fish are lower due to the larger dilution factor.

5. How does FDA find all of this material on same chromatogram?

   ans.: As mentioned in answering questions (1) and (2), the FDA has the capabilities to run these samples on various type columns under various treatment conditions, therefore, Dr. Tucker felt confident that these FDA numbers were realistic.

Questions (continued):

6. Do we (Monsanto) have any data on confidence levels in biological samples? If so, how accurate are the numbers?

   ans.: In Dr. Tucker's opinion, biological samples run in an accuracy range from 5 to 10% would be relatively easy.

I will be happy to answer any further questions you might have concerning this data.

Should any legal action ever be taken which might concern this data or any similar data, I would recommend that we consult very closely with Dr. Tucker since his experience with this type data should prove invaluable.

Sincerely

E. G. Wright

EGW/bs