

Monsanto

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SPECIAL PROGRAMS DIVISION

March 23, 1984

From E. MORAN
Ref. No. P 77 E; PE-ERTG-24I
Date MAR, 1984

To: CMA Phthalate Esters Panel and
ERTG Members

Dear Colleagues,

At the March 21 Panel meeting, we discussed the feasibility and cost for Monsanto to prepare and submit a report on DEHP and DBP concentrations from our 1982 aquatic monitoring study. J. P. Mieure indicated that by Monsanto's analysis, a fair price would be \$10,000 per compound per year, or \$20,000 for the 1982 data. The panel offered \$10,000 for the reports. We have reviewed this proposal with our management. We continue to believe that \$20,000 is a fair price and do not accept the \$10,000 offer. As discussed at the Panel meeting, the actual cost for Monsanto to obtain the data was approximately \$20,000 because we had to perform numerous extra analyses to identify sources of laboratory contamination, and actually resorted to laboratory modifications (i.e., removing floor tile).

Had the Panel/ERTG agreed to include and fund these compounds in the monitoring study as originally proposed by Monsanto in 1982, the cost would have been equivalent. We see no reason to reduce the value of the data below our actual cost.

Should the panel agree to purchase the data at the \$20,000 price, it would take Monsanto approximately 6 weeks to prepare and issue the report.

We believe the best way to resolve the financial issue is for each Panel representative to call Bette and tell her whether you want Monsanto to prepare the report at a cost to the Panel of \$20,000. If a majority approve, Bette can contact me and we will initiate work on the report. An alternative is to discuss the matter at the April 18 Panel meeting, which would delay the issuance date.

Regards,

J. P. Mieure

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A. F. Werner (m)

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