

Monsanto

Part A 1343

NAME-LOCATION-PHONE: R. Sinise - W. G. Krummrich Plant

DATE: April 12, 1979

cc: J. W. Molloy
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SUBJECT: FDA Inspection

REFERENCE: M. A. Pierle - G4WA

This memo summarizes the plant program in response to the FDA visit and subsequent request concerning dioxin data.

The plant does not have any data concerning dioxin concentrations of the plant effluent, Mississippi River, or the landfill leachate. The lab has run dioxin tests in the products pentachlorophenol and orthochlorophenol. The tests are four years old with an accuracy of 1 to 10 ppm. Analysis accuracy in the last six months has increased to 10 to 50 ppb. Therefore this data and any outside data available would not be useful. I recommend we inform the FDA that a program is underway for dioxin testing in our effluent and results will be transmitted to them.

The testing program will start the week of April 16th. The program consists of:

1. A series of three 24 hour composite samples from the plant effluent will be taken during the week for dioxin analysis. These samples will be sent to Dayton for testing.
2. A fourth bulk sample will be obtained for use as a standard. This standard will be spiked with a known amount of dioxin to test the analysis accuracy.
3. The landfill testing program consisting of a series of grab-samples in the test wells is on hold. When the accuracy of the testing method is confirmed, then samples will be obtained and sent to Dayton.
4. Air testing for dioxins will not be part of the program. A reliable testing procedure is not known at this time by Monsanto.

The analysis method for dioxins in water samples contaminated with organics is difficult requiring one manday per sample. A plant effluent general analysis test was completed in August 78. The EPA is conducting an analysis and Dayton Labs has completed its corresponding analysis (Report MDA-020). However, Dayton did not test for dioxins.

The test results are targeted for completion by April 27th.

R. Sinise

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