

October 9, 1979

cc.

H. M. Keating - G4WA
H. W. Kilbourne - N3A
W. J. McCarville - A3NC
J. W. Molloy - 1740
G. E. Paget - G4EA

Krummrich OSHA Citations

PSP to H.M. Keating, et.al., 10/5/79

P. S. Park
E2NE

W. J. McCarville
W. J. McCarville
W. J. McCarville

Re: Item 8(a).

My dictionary defines "by-product" as "something produced in addition to the principal product". To contaminate is "to make ... impure by admixture". There's no disputing the fact that the aforementioned "dioxins" ^{were} contaminants in our chlorophenols. However, I'm afraid we will be guilty of deceit if we deny that they might not also be by-products. Certainly the fact that TCDD concentrations declined following certain changes in operating procedures at WCK argues that they were being formed as by products of manufacture. Especially since those changes were designed to eliminate TCDD formation.

Re: Item 8(b).

It is accurate to say that we have not detected contamination of our products by polychlorodibenzofurans if "poly" equals three or more. Very low (< 50 ppb) levels of mono- and dichlorodibenzofuran have occasionally appeared. (We are somewhat skeptical about the validity of these results, but we can't deny them at this time.)

James D. Wilson

James D. Wilson

JDW/bh

P.S. Re 54: I think that accident involved the 2,4,5-trichlorophenol process, as stated. The phenol was converted to 2,4,5-T in another department.

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SUBJECT TO PROTECTIVE ORDER.

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