

Monsanto

LAW DEPARTMENT

1241 ~~1375~~

DATE January 7, 1981
SUBJECT TSCA Substantial Risk
Evaluation--Dichlorophenol
REFERENCE
TO Memorandum to File

cc C. F. Callis
J. R. Condray
G. J. Levinskas
G. Roush
✓ J. D. Wilson
P. L. Wright

xc Annall
Hrad
Richardson
Stohr 2/24/81

On January 6, 1981, the above named persons and the undersigned met to consider whether certain information reasonably supported the conclusion that dichlorophenol marketed by Monsanto presents a substantial risk of injury to health or the environment requiring immediate notification to the EPA.

A memo dated October 10, 1980, from R. F. Ivory (Dayton Lab) to J. A. Gloeckner (Krummrich Plant) described the results of analyses of 81 samples of chlorophenols (including 55 samples and a number of spikes, duplicates and blanks) for the presence of chlorinated dibenzo-p-dioxins. The table of analytical results attached to the memo showed that some samples contained tetrachlorodibenzo-dioxin (TCDD) at levels ranging from one to three parts per billion, with only one analysis indicating a higher level. It was apparently the detection of TCDD in dichlorophenol that led to the subject meeting.

The major purchaser of dichlorophenol (Diamond Shamrock) uses it in the manufacture of 2,4-D. There are two other smaller customers, one of which uses the material in the manufacture of 2,4-D, while the other incorporates it into oil well additives.

It was concluded that the extremely low levels of TCDD found in dichlorophenol, particularly when further diluted by customers' operations, would be unlikely to cause any health or environmental hazard. No attendee at the subject meeting was aware of any harm which has been caused to health or the environment as a result of the trace amount of TCDD present in dichlorophenol.

It was, therefore, concluded that notification is not required by TSCA Section 8(e).

The attendees at the subject meeting agreed, however, to recommend to the dichlorophenol marketing group that customers purchasing the material be advised of the above described analytical results.

Phocion S. Park
Phocion S. Park

CONFIDENTIAL
SUBJECT TO PROTECTIVE ORDER.

jf

C10255