YELLOW

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INTER-OFFICE CORRESPONDENCE

Industrial BIO-TEST *Laboratories, Inc.*

FROM: CM

DATE: August 1, 1969

TO: OEF

SUBJECT: A7204 Conference

Monsanto

cc: JCC
MLK
KE

Key Issue: Establish safety of the Aroclors in the environment

Objective: Determine toxicity of Aroclors to fish. Provide basis for comparison to pesticides (DDT) and other materials

Action: Matrix
Publish results

A7204 did not accomplish the objective and was criticised for the following reasons:

1. The LC_{50}'s reported for trout as > 100.0 ppm represent nominal concentrations that are misleading and intellectually repulsive. The concentration of test material in a bioassay vessel should not exceed the solubility of that material, especially when tissue residue studies are being conducted.

2. Cross-contamination of bioassay vessels.

3. The LC_{50}'s for Aroclors 1242 and 1254 (Bluegills) were not properly expressed. The values represent gross graphical interpolations since there were no partial responses.

4. The fish should have been rinsed before freezing. Also, since there was an excess of test material in the bioassay vessel, the concentration of test material in the fish could have been due at least in part to oral ingestion rather than absorption through the gills.

C12084

DEFENDANT'S DEPOSITION EXHIBIT 234 10-15-86 04

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