Monsanto INDUSTRIAL CHEMICALS CO.

FROM (NAME & LOCATION) R. G. Kaley - T2F

DATE : February 26, 1976

SUBJECT : EPA USE OF PERCHLORINATION TECHNIQUES FOR DETERMINATION OF PCBs

REFERENCE : JPM to DW 1/16/76; REH to DW 2/4/76

TO : J. C. Weber
B2SK

cc: W. C. Hammann - T3A
R. E. Hatton - B2SC
O. Hicks - T2F
R. E. Keller - T1B
J. P. Mieure - T2F
D. Wood - B2SD

At the request of Jim Mieure, Dr. Gil Veith, EPA National Water Quality Lab (NWQL), Duluth, Minn. and I discussed Monsanto's concerns regarding the interferences in the use of perchlorination techniques for the determination of PCBs.

Veith expressed interest in our results from the perchlorination of biphenyl and alkylated biphenyl and agreed that these types of materials are potential interferents for PCB determinations. He did express some concern that a Gene Wallen of the Office of Toxic Substances might be using procedures including perchlorination techniques contained in a method received from Environmental Engineering Associates under an OTS-funded method development contract. Veith feels the firm "essentially took a method from the literature and sold it to OTS." However, he did not feel that this use of the technique is a serious concern at this time. He also said that there is "very little chance" that perchlorination would be used by other EPA personnel for PCB determinations.

Veith suggested that if we wished to pursue the matter further, we might contact (by phone or by a letter containing our data) Al Trakowski, EPA R&D, Deputy Assistant Director of the Division for Monitoring and Technical Support (202-426-2204) or Bill Crowley, Technical Support Staff (202-426-2384). According to Veith, this group would be the one contacted by regional EPA surveillance labs or state labs for methodology recommendations.

An option I personally favor is publication of our data in a technical journal. This would entail some additional laboratory work, e.g. perchlorination of other substituted biphenyls, such as hydroxylated PCBs (PCB metabolites). However, publication would assure wider dissemination of our concerns with the technique. We would be interested in the business group's and your feelings regarding further action on our part.

R. G. Kaley

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