Monsanto

FROM (NAME & LOCATION) Dept. of Medicine & Environmental Health

File Copy - G.J. Levinskas, A2SG

DATE: April 22, 1977

CC: J.C. Weber - B2SK
G. Roush, Jr. - A2SA

SUBJECT: PCBs

REFERENCE:

TO P.S. Park
E2ND

This is an abbreviated reconstruction of a rather lengthy phone call received on April 20, 1977 from

Elaine Johnson, Secretary
Wisconsin Commercial Fisheries
Sister Bay, Wisconsin 54234
tel. 414/854-4600

The proposed reduction of temporary tolerances for PCBs [Fed. Reg: 42(no. 63), 17487-17494, Friday, April 1, 1977] has caused great concern among members of the Wisconsin Fisheries Association. They are attempting to fight this action which would set a new temporary tolerance of 2 ppm, down from the present 5 ppm, in fish.

Ms. Johnson wanted to know if we could make available to her association any toxicity data which could be useful for this purpose. Apparently, the association is gearing up for a hard fight. They have also requested that the Great Lakes Committee - composed of about 132 members - meet with the association so that the association can attempt to get their support for doing battle with FDA. Ms. Johnson expressed the view that the proposal to reduce PCB levels was "not based on full and complete information". She seems to believe that we could supply them with such data.

Ms. Johnson also made some fragmented comments about additional work done by Dr. James Allen at the University of Wisconsin with PCBs in primates. In those studies, he apparently has detected a no-effect level, and the association is trying to get him to support them. As you may recall, Dr. Allen's monkey work indicated that PCBs produced effects at lower levels than had been reported previously. I suggested that it would be most helpful if they could get Allen to speak out stating that he had determined a no-effect level in primates.

Ms. Johnson was told that we had made all of our data available to the regulatory agencies, and that I didn't know if we had anything new to add. She still requested copies of our data. Therefore, I told her I would check to see who in Monsanto was doing what about the proposed reduction of tolerances, and that someone probably would get back to her. She replied that she was in and out of the office, collecting water samples, etc., so that if she didn't answer her phone, we should just keep trying.

As a result of that conversation, I pose the following questions.

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1) Is anyone in Monsanto doing anything about FDA's proposal to reduce the tolerances on PCBs?

2) If the answer to 1) is no, should anyone do anthing? The cutoff date for comments to FDA is May 31, 1977.

3) What, if anything, should we supply to or tell Ms. Johnson as a result of her requests?

4) Should we attempt to find out what Dr. Allen's latest findings are?

I await the counsel of counsel.

George J. Levinskas

/bkp

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