TLG. 7/31

Rough memo 7/30

1. Page 2 (2). See footnote 12 Page 37255 of Dieldrin testimony Fed Register 39 203 Oct 18 74.

2. Page 2 3 (1). - I thought our experts disagreed. Bidstrup say non carcinogenic.

3. Page 3 (3) Do not at once accept comparison with Dieldrin, Aldrin

- EPA evidence says of there
(i) Positive evidence of malignancy based on metastasis to other organs and transplantability into untreated host animals
(ii) Tumors have resulted from dietary doses as low as .1 ppm in the diet

Bidstrup on Aroclor slow.
Lack of metastases
Lack of transplantability.
Kimbrough work on 1260 was at 100 ppm.

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4. Page 4. (4) Should use FDA 'Food Basket' reference. As contrast Dieldrin

5. Page 4. Para 1. - Need to update in respect of Heptachlor and chlordane status.

6. Page 5. - Why hang ourselves by comparison with DDT Carbon Tet. Is it not better to delete that 'overall interpretation' sentence.

paraphrase

I would favour ~~xxxx~~ of EPA's own statement page 37247 Fed Register

'Evidence of liver ~~tumours~~ tumors caused by Aroclor 1260 in a single strain of rat raise a substantial question of safety but not a red light requiring immediate elimination of all ~~PCB~~ Aroclor 1260 residues.

-- Aroclor 1254 and 1242 have not been shown to be carcinogens.