Monsanto

FROM (NAME & LOCATION) Medical, A2SC

DATE September 27, 1974

cc E. P. Wheeler - A2SA
V. W. Saeger - T2B

SUBJECT Review of Draft re: PCB Effluent Standards

REFERENCE WBP to circ., 9/11/74

TO :

H. S. Bergen - B2SL
[redacted]
D. B. Hosmer - E1SF
W. B. Papageorge - B2SK
P. S. Park - A3SA
E. S. Tucker - T2F

Present for: EPA - Mr. Joseph Lewis
Mr. Thomas Kopp (intermittent)
Monsanto - Victor Saeger
P. L. Wright

Mr. Lewis has prepared a draft summarization of the material presented at the PCB Effluent Standard Hearings held by EPA. Included in his review is the information included in the original proposal as well as the testimony presented by industrial and governmental representatives. Mr. Lewis has included in his review, information in the written testimony of Drs. Duke (Gulf Breeze) and Vieth (Duluth) even though that testimony was not allowed to become part of the record during the hearings.

After determining that Mr. Lewis had a very elementary understanding of the chemical composition of PCB's, we (Saeger and Wright) described in great detail the chemistry of commercial PCB's. I believe that as a result of this discussion, Mr. Lewis has at least a conversational understanding of the differences in homolog distribution between the Aroclors.

Saeger, very thoroughly reviewed the results of the biodegradation (SCAS) studies and pointed out the differences in rate of degradation of the mono, di and trichloro homologs versus the higher chlorinated homologs. This presentation appeared to convince Mr. Lewis that we could document differences among the homologs. Mr. Lewis took great exception, almost vehement, with the proposal to include the tetrachloro and higher homologs in the definition of PCB's. We explained that our intention was not to change the dictionary definition but only to state specifically which homologs should be included in monitoring programs to determine the amount of "PCB's" being discharged. With this explanation, Mr. Lewis stated that he clearly understood this suggestion for revision and would recommend to others in EPA that the effluent standard be based only on those homologs containing 5 (penta) or more chlorine atoms on the biphenyl. -- I question Mr. Lewis's understanding and his ability to communicate our suggestions to others in EPA.

MCK

Mr. Lewis stated that he foresaw the establishment of a relatively restrictive standard based upon the currently available information; this initial standard would then be revised upward by EPA as additional information became available. He specifically suggested that we conduct biomagnification studies in which fish are caged in natural waters. This he believes will demonstrate the extent of bioaccumu-

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lation of PCB's from both disolved and sediment-associated PCB.

We were successful in improving our communication with Mr. Lewis. We should determine his relative significance in final effluent standard establishments and continue to give him assistance.

Mr. Kopp stated that he believed that a new statement "Proposing to Establish Standards" would be published in the Federal Register - no date was projected. That action would move us back to square 1.

Paul L. Wright

/bkp

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