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Monsanto

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April 29, 1982

John C. Sabetta, Esq.
Townley & Updike
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405 Lexington Avenue
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RE: Agent Orange - TCDD Content of 2,4,5-T

Dear John:

This letter is in response to your inquiry of March 24, 1982, concerning the discrepancy between the 1968 TDD analytical data reported in the 1969 Technical Services Annual Report and TDD results reported by the Nitro Quality Control Laboratory covering that same time period. Enclosed are two documents prepared by Dr. Terry Parker of the Nitro Plant which address this issue.

As Dr. Parker indicates, the data appearing in the Annual Report probably stems from a Technical Services Report prepared by J. C. Strum dated 2/21/69. This report is in the Agent Orange file under old coding number 16214-16216. You will note that this report, as does the Annual Report, refers to TDD content in the NaTCP autoclave, while the laboratory work refers primarily to TDD content in the finished 2,4,5-T acid. Analytical work on finished product is easily recognized because lot numbers of material ready for shipment are preceded by two alphabetical letters. The lot numbers for material shipped during 1968 were preceded by the letters NK. The laboratory results on some of this material can be found in the Agent Orange file under old coding numbers 015718, 015719, 015720 and 015721. These results show the TDD content ranging from trace to 12 ppm.

Since the data in question resulted from samples taken at widely separated points in the process, this can explain the variation in analytical results. However, it does not explain why the variation occurred. Somewhere between the NaTCP

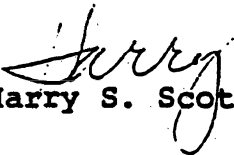
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autoclave and the 2,4,5-T acid dryer, the level of TDD was significantly reduced, and at this time we can't explain it. I've discussed the problem with Dr. William Udell, our 2,4,5-T expert, and he does not have a ready answer either. However, we'll continue to work on it and hopefully arrive at a reasonable explanation.

Sincerely,


Harry S. Scott

HSS:jk
Enclosures

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