Monsanto

FROM (NAME & LOCATION): G.J. Levinskas - A2SC

DATE: December 15, 1975

SUBJECT: MCS 1238: Final Environmental Compatibility Assessment (EC-202)

REFERENCE: SMB to GJL, 12/5/75

cc: W. C. Hammann - B3SA
C. Paton - B2SC
D. Wood - B2SD
M. E. Gibbs - W1A
R. A. Pohl - B2SB
J. C. Weber - B2SK

TO:

S. M. Balaban
W1A

A Preliminary Environmental Compatibility Assessment (EC-201) was made earlier on this product (GJL to RHM, 2/28/73). At that time, it was indicated that some additional toxicity testing be undertaken. The tests recommended at that time have been completed with satisfactory results.

During the intervening period, however, the PCB issue has flared up again. The fallout from that experience, as well as reassurances of environmental and general safety requested by potential customers, have prompted us to review the amount and nature of toxicity data now deemed necessary to market this product and to defend it against allegations of harm to the environment. A list of such tests was recently prepared (PLW to WCH, 12/11/75).

These tests may be broken down into 2 categories; those aimed at evaluating environmental effects and those designed to evaluate long-term health effects such as carcinogenicity. On the basis of currently available information, MCS 1238 and its components are not expected to persist in the environment or to bioaccumulate as the PCBs do. Additional tests of relatively short-term duration are planned to provide further evidence for the lack of serious environmental effects. Long-term tests (ca. 2 years) will be needed to assess the potential carcinogenicity of MCS 1238 and its components. Since these studies are about to be initiated, it will be a long time before results are available. However, neither component is suspected of carcinogenicity, and it can reasonably be anticipated that the proposed lifetime rodent feeding studies will not demonstrate tumorogenicity of these materials.

In view of the accelerated desire to substitute MCS 1238 for PCBs in capacitors, and since available toxicity data indicates that this may be an acceptable replacement, this product is given a conditional approval for commercialization. The conditions are that the proposed tests referred to earlier be initiated as planned, and that the results of those tests continue to show that MCS 1238 is acceptable from human and environmental health standpoints.

George J. Levinskas

0072053

/bkp

TOWOLDMON0056900