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FROM: NAME & TELEPHONE R. C. Isham - BLND - 2621

DATE February 21, 1979

cc J. R. Foehr - B2SA
J. S. Metcalf - B2NK

SUBJECT Toxicological Significance

REFERENCE

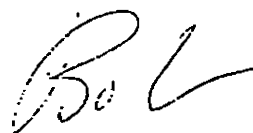
TO : C. F. Callis - B2SA

As we've discussed, analysis of our products for TCDD is giving us a white knuckle atmosphere around here. I'm beginning to wonder if we aren't our own worst enemies on our testing procedures. Your people can measure TCDD in amounts even smaller than .010 ppm. "Somebody" has determined that .010 ppm is the level of "toxicological significance," and we duly reported our OCP reserve sample had TCDD at an average amount .037 ppm to the EPA.

My question is, who is the "somebody" that said .010 ppm has "toxicological significance"! Why isn't the level of significance 0.1 ppm? Is there any indication that lower concentrations are hazards?

I'm not a chemist, but neither are most reporters. Jim Mieux helped me figure out that our trace TCDD contamination in the Sturgeon car works out to 1/8 ounce in 207,000 pounds of material. I don't know if that's hazardous or not, but I do know we reported our findings and we're greeted with both regional and political concern. Could we have said, "We examined the reserve sample and found no TCDD at the level of toxicological significance which is 0.1 ppm"?

I also note that Federal pesticide regulations set an upper limit of 0.1 ppm of 2,3,7,8 TCDD in 2,4,5-T pesticide. If that parameter is okay for Uncle, why are we asking our people to search for smaller concentrations in our products?



R. C. Isham

RCI:jt

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