copies for Callis, Weber, Nixon, Mieure, Kaly

PCB REGULATION was thrown into a cocked hat last week when U. S. Fish & Wildlife scientist Dr. David Stalling reported at the American Chemical Society meeting that polychlorinated dibenzofurans, 1,000 times more potent than polychlorinated biphenyls and a probable carcinogen and teratogen, accompanies PCBs and is often masked by the parent chemical. Meanwhile, EPA officials were at Midland, Mich., this week receiving part of the information the agency subpoenaed in connection with Dow Chemical's production of monochloro biphenyl (See Sept. 5, Page 10).

THE WHITE HOUSE Regulatory Analysis Review Group, established to make certain that government regulations make economic sense, has so far left TSCA implementation alone and has not commented on any TSCA proposals.

EPA SCIENCE ADVISORY BOARD's subcommittee on toxic substances will meet Sept. 19 at Waterside Mall to review health effects tests standards proposed by the Office of Toxic Substances.

HEXACHLOROCYCLOPENTADIENE was inadvertently left off of the list of chemicals for which the Interagency Toxic Testing Committee recommended epidemiological studies (See May 16, Page 27), EPA corrected in a Sept. 4 Federal Register announcement.

EPA'S JOAN Z. BERNSTEIN, Office of General Counsel, will serve as Acting Assistant Administrator for Enforcement until EPA finds a replacement for Marvin Durning. Swep T. Davis, formerly Deputy Assistant Administrator for Water Standards and Planning and James N. Smith, formerly a Special Assistant to Thomas C. Jorling, have been appointed to the positions of Associate Assistant Administrators for Water and Waste Management. Davis will focus on strategy development and "superfund" while Smith will work on program operations.

EPN RPAR NOTICE is scheduled to be published by EPA in the Sept. 19 Federal Register with an Oct. 29 deadline for filing rebuttals. The deadline will probably be extended to early January. The RPAR is based on delayed neurotoxicity (See Aug. 29, Page 21).

HOELON 3 E C, diclofop, (See Aug. 1, Page 2) slides from animal studies were scheduled for a side-by-side review Sept. 12 at a meeting of EPA scientists, Dr. Melvin Dwaine Reuber, National Cancer Institute-Frederick Research Center, and scientists with American Hoechst Corp. It is understood that Dr. Reuber's earlier review of the slides noted carcinogenic effects.

NOTICE that Mobil Chemical Co. has applied to the EPA to register Hefty Dog/Cat Repellent containing 16.4% of the new active ingredient cinnamic aldehyde was published in the Sept. 6 Federal Register. The company proposed the pesticide be classified for general use to repel dogs and cats from garbage bags and cans. Comment deadline is Oct. 9.

PESTICIDE PETITION filed by American Cyanamid, and noted Sept. 6 would set tolerances for residues of pendimethalin of 0.1 p.p.m. in or on sorghum grain, fodder, and forage. The herbicide is N-(1-ethylpropyl)-3,4-dimethyl-2,6-dinitrobenzenamine and its metabolite 4-((ethylpropyl)amino)-2-methyl-3,5-dinitrobenzyl alcohol. EPA on Sept. 4 made further editorial changes in its alphabetical list of pesticide chemicals (See July 11, Page 5), deleting extraneous listings and adding those that were inadvertently omitted.

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applicant relies on Monsanto data either by "cite-all" or specific reference; notice to company and to above named law firm; registration cannot be issued until 20 days from the date of the notification letter; the requirement does not apply if the applicant submits his own data or data other than Monsanto's to support the application or is authorized by Monsanto to use Monsanto's data.

The Diamond Shamrock stipulation procedures include: (1) above with 30 days notice to the company; registrations cannot be issued until 35 days from the date of the notice letter; and, essentially (4) above.

The Merck and Company, Inc. stipulation procedures included: 30 days notice as in (1) above to the company's counsel, Patrick M. Raher of the law firm of Hogan & Hartson, Washington, D.C.; registration cannot be issued until 35 days from the date of the notice letter; and, essentially (4) above.

Provisions of the Petrolite Corporation stipulation compliance procedures: 15 days notice of intent to "register any product or accept an amendment containing gluteraldehyde as an active ingredient if the product is labeled for use in oil field operations" sent to Raher, Hogan & Hartson as above; registration cannot be issued for 20 days from the date of the notice letter; and, substantially (4) above.

In complying with the provisions of the injunctions and stipulations, the Registration Division will find all registration actions covered by them on ever-changing lists, inform the applicants, tell them how to comply, wait for their response, notify parties to the injunctions and stipulations, wait for their responses before acting. Delay and error seem unavoidable.

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PCDFs, BY-PRODUCTS OF PCBs, FOUND IN FISH; TOXICITY UNKNOWN

Fish contaminated with polychlorinated dibenzofurans (PCDFs), a by-product of polychlorinated biphenyls (PCBs), have been found in the Ohio, Connecticut, and Hudson rivers and Lake Michigan, near Saginaw, Mich., a federal Fish and Wildlife Service researcher reported Sept. 10 at the American Chemical Society (ACS) national meeting in Washington, D.C. (See Page 2).

Dr. David Stalling, the Interior Department researcher, said PCDF can be formed by the oxidation of PCBs, especially when they are burned at relatively low temperature. "We know that very high temperature burning, if done for long enough, will completely destroy PCBs," Stalling said. "However, Dr. Christopher Rappe, University of Umea, Sweden, has demonstrated that low temperature combustion in the 400 degree to 600 degree Celsius range can convert 25 percent of PCBs to PCDFs."

The PCDFs, at concentrations up to 2 parts per billion (p.p.b.), were found in carp, catfish, lake trout and coho salmon in areas where there has been a historic problem with PCB contamination, Stalling said.

"We have not yet identified the individual chemical structures of the PCDFs in our (fish) samples," he said, "so we cannot be sure which of the 135 possible compounds are present or whether they might have toxic effects."

"Once specific PCDFs in fish are identified, laboratory scientists will have a better idea how they are formed, and which structures should be tested for possible toxic effects in fish and other aquatic organisms," the USDI researcher concluded.

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