

Monsanto

LAW DEPARTMENT

CONFIDENTIAL

XK 882

DATE December 14, 1981

SUBJECT TO PROTECTIVE ORDER

RE: TSCA Substantial Risk
Evaluation--93% 2,4-Dichlorophenol

C. F. Callis
G. Roush
J. R. Condray
J. H. Senger
J. D. Wilson
H. W. Kilbourne
P. J. Arnall

TO Memorandum to File

On November 24, 1981, the above named persons and the undersigned met to consider whether certain information reasonably supported the conclusion that 93% 2,4-dichlorophenol marketed by Monsanto presents a substantial risk of injury to health or the environment requiring immediate notification to the EPA. An analysis of 93% 2,4-dichlorophenol for chlorinated dibenzofurans (CDF) was recently performed by the Dayton Laboratory. The analytical results indicated that the product contained up to 1 to 2 ppm of total CDF. The question presented was whether this level of CDF in this product presents a substantial risk of injury to health or the environment.

It was recognized that this level of CDF did not present an acute toxicity risk. After considerable discussion, however, it was concluded that very little was known concerning the chronic toxicity of CDF. Dr. Roush was requested to study this matter, including reviewing the report from the Dayton Laboratory, after which the group would reconvene.

The group described above (except J. H. Senger) reconvened on December 14, 1981. The limited information available generally supports the conclusion that the acute toxicity of CDF is approximately an order of magnitude less than the acute toxicity of comparable chlorinated dibenzodioxins. Also, it was noted that no 2,3,7,8-dibenzofurans were found in the 2,4-dichlorophenol. Levels of up to 100 ppb 2,3,7,8-tetrachlorodioxin have been believed to be safe levels by some toxicologists for 2,4,5-T. Further, PCBs containing CDF as impurities have been extensively studied. A recent review of the extensive data on PCBs has led to the conclusion that there are no significant human health hazards from low exposure. These considerations indicate that the small concentration of total CDF described above should not be considered a substantial risk. It was also noted that the product has been produced and marketed for 30 to 40 years without any evidence of substantial danger to health or the environment.

After considering the information described above, it was considered that notification is not required by TSCA 8(e).

Phocion S. Park