Monsanto INDUSTRIAL CHEMICALS CO.

FROM (NAME & LOCATION): R. E. Keller - T1B

DATE : September 26, 1975 cc: J. P. Mieure - T2F

SUBJECT : COMMENTS ON PCBs AT INTERNATIONAL MEETING

REFERENCE :

TO : H. S. Bergen - B2SL
R. H. Munch - T1B
W. B. Papageorge - B2SK
W. R. Richard - T3A

While attending the International Conference on Environmental Sensing and Assessment on September 15 at Las Vegas, Nevada, I heard the following papers of interest to your business unit.

1. Environmental Levels of PCBs
   Doris J. Ruopp and Vincent DeCarlo
   Office of Toxic Substances
   U.S. Environmental Protection Agency
   Washington, D.C.

2. Polychlorinated Biphenyls Off Southern California
   D. R. Young, D. J. McDermott and T. C. Helsen
   Southern California Coastal Water Research Program
   El Segundo, California

I talked with DeCarlo and McDermott after the meeting and they both promised to send me a full copy of their data and detailed reports. I will circulate this information upon receipt to recipients of this memo. This will supplement my report which I have already made to Bill Papageorge by phone.

Additional key points are as follows:

1. The EPA has a new monitoring program for PCBs underway. This is on a national basis involving ambient air and water with 300 to 500 samples from Boston, Denver, Los Angeles, Seattle and a location in Kansas.

2. Insufficient data make it impossible to show trends in buildup or decline of PCBs over the past four years. Plans should have been made five years ago to obtain such data.

3. The EPA thinks PCBs found should be reported as the deca chlorinated compound.

4. Soil studies have been made by the EPA at distances up to 1 1/4 miles from our Krummrich plant site. Our plant was referred to as an Illinois plant during the presentation of the paper. PCBs at varying levels were found.

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5. All states have been shown to contain some level of PCB environmental contamination with fish being looked at the most.

6. Available information on sediment studies shows that there is no decrease in PCBs in the U.S. from 1971 and 1972 to 1974.

During a session on the legal aspects of monitoring, it should be noted that the following panel member was extremely anti-PCB:

John P. Hills
President's Council on Environmental Quality
Washington, D. C.

His comments, made voluntarily out of the context of the session subject manner, were as follows:

1. "strongly in favor of zero discharge for PCBs".

2. "EPA has authority to totally eliminate PCBs but has not used it yet - economics should not be a consideration where severe health considerations exist".

R. E. Keller

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