Monsanto INDUSTRIAL CHEMICALS CO.

JAN 21 1974

FROM (NAME & LOCATION): E. S. Tucker - T2F

DATE: January 17, 1974

cc: R. E. Keller - T1B

SUBJECT: EPA'S PCB EFFLUENT GUIDELINES

REFERENCE:

TO: W. B. Papageorge
BIND

(1) Published articles showing that MCBP's are more biodegradable.

Copies of the following articles are attached:

- Ahmed, M., and Focht, D. D., Can. J. Microbiol. 19, 47 (1973).
- Ahmed, M., and Focht, D. D., Bulletin of Environmental Contamination and Toxicology, 10, 70 (1973).

(2) Published articles showing that there has been a decrease in the ambient PCB levels found in the environment.

No articles found except the one you mentioned. However, Harvey gave me an oral summary of his findings which he said we could use. It is as follows:

Statement obtained from Dr. George Harvey, Woods Hole Oceanographic Institute 1-9-74; permission to quote given.

"In the summer and fall of 1972 the surface waters of the Eastern and Western North Atlantic ocean had an average PCB concentration of 30 parts per trillion. By the summer and fall of 1973, the average PCB concentration in the same areas had decreased to about 1 part per trillion.

"Since the suspended solids fall out and mixing rates of the ocean are constant, the observed reduction in surface layer concentrations indicate a reduced PCB input."

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(3) Comments on EPA PCB test method.

I obtained a copy of 40 CFR part 136 (38 FR 28758 et. seq., October 16, 1973) noted in the EPA Proposed Toxic Pollutant Effluent Standards sec. 129.01c Compliance part (a) from Elmer Wheeler. It did not contain any details (copy attached), item 59 - page 28759, also see footnote 6. However, I had a copy of the proposed procedure which I obtained from Jim Lichtenberg, Minn. EPA, at the Duluth PCB meeting in

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(3)(Cont'd)

May, 1972. The following comments refer to it (copy attached). I also called Jim (1-14-74) and asked him to send me a copy of the test method containing the latest revisions. He agreed and is sending it air mail - special delivery. Jim said the procedure is relatively unchanged with the exception of adopting Ron Webb's method of estimating PCBs. He also commented that with "clean" samples they felt they could produce quantitative numbers at the 50 ppt and with "less than clean" samples at the 100-200 ppt level. He further stated that they could do it with good precision and accuracy (no numerical data available). I asked if they had done any round robin studies yet; he indicated they had not, but plan to through ASTM D-19. Apparently, the EPA procedure is being balloted on for acceptance as a standard ASTM procedure and under the auspices of the ASTM, a round robin is planned. I indicated we might be interested in participating and he said he would send the details with the test method. He also said that this ASTM committee was holding a meeting in the next few weeks in which we might have some interest. When I hear from Jim, I will send you the details.

E. S. Tucker

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Attach.

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