MONSANTO INDUSTRIAL CHEMICALS CO.

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

DATE: July 25, 1973

SUBJECT: NERC/RTP POSITION PAPER ON POLYCHLORINATED BIPHENYLS

REFERENCE: WBP 7/12/73 Memo to REK

TO: E. P. Wheeler - A2SA

cc: M. W. Dietrich - T2B
J. P. Mieure - T2B
W. B. Papageorge - B2NA
E. S. Tucker - T2F

Section II of the draft of the subject paper has been reviewed. This paper represents a rather complete literature survey of available sampling and analytical techniques. Overall, we see no comments adverse to our own policies and procedures in this area.

Miscellaneous comments of persons reviewing this paper are as follows. Most of these relate to Section I on summary and conclusions.

J. P. Mieure

"This paper states on page 1 that chlorinated dibenzofurans and chlorinated dibenzodioxins have been found in PCB's. To the best of our knowledge, the latter is not true and should be deleted. Also all subsequent references to chlorodioxins and chlorophenols should be deleted. These are not pertinent to a paper on PCBs and their inclusion is an implication of their presence.

See pages 20, 21, 26-32, 35, 36, 44, 51-52, 58-61, 65, 88, 89

On page 33, it is implied that Aroclors may contain impurities of sufficient magnitude to introduce errors if one is using the Aroclor as a standard. It has been my experience that this is not true. Aroclors are 99%+ biphenyl and chlorobiphenyls."

M. W. Dietrich

"Page 1 and subsequent pages - all references to chlorinated dibenzodioxins and chlorophenols should be deleted.

"Page 2 - change verbage to past tense."

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E. S. Tucker

"Very poor review; suggest they see CEQ Task Force paper."

I presume you will fit these comments into the general format of your reply with appropriate editing for consistency and acceptability to outsiders.

R. E. Keller

db