

Monsanto

PX 1559

FROM: NAME-LOCATION-PHONE: Edwin L. Head - B2SB (4-2727)

DATE: February 27, 1980

CC:

Central Files

SUBJECT: 2,4 CHLOROPHENOL

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REFERENCE:

TO: File

The Detergents and Phosphates Division has reconsidered the issue of continuing to manufacture and sell 2,4 Dichlorophenol, 93% assay, (2,4 DCP, 93%) after facilities to manufacture a 97% assay product become operational in the second quarter of 1980. The conclusion was that Monsanto should continue to manufacture and sell the 93% assay product along with the 97% product.

The D&P Division had previously planned to discontinue the manufacture of 2,4 DCP, 93% when the increased capability for manufacturing the 97% product becomes operational in the second quarter of 1980. This plan was based partially on a published report of tests conducted by the National Cancer Institute showing carcinogenic response in test animals to 2,4,6 Trichlorophenol (2,4,6 TCP). Monsanto's 2,4 DCP, 97% product contains only trace quantities of 2,4,6 TCP.

The decision to continue to offer 2,4 DCP, 93% for sale was based on the following factors:

- Monsanto's DMEH evaluation of the NCI bioassay study of 2,4,6 TCP showed that:
 - 2,4,6 TCP shows very weak carcinogenic responses in both rats and mice.
 - 2,4,6 TCP occurring in Monsanto's 2,4 DCP, 93% at the 4-6% level does not constitute a hazard to the health of Monsanto workers, Monsanto customers or the public at large.
- Letters were sent to all Monsanto customers of 2,4 DCP, 93% advising them of the 2,4,6 TCP content of our product and of the published NCI bioassay study. No negative customer responses have been received. Two significant customers indicated that they desire to continue to use the 93% product.

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MEMO TO FILE
2,4 CHLOROPHENOL
February 27, 1980
Page 2

- Approximately 90% of Monsanto's 2,4 DCP, 93% sales is used in the manufacture of 2,4 Dichlorodiphenoxyacetic acid (2,4 D). Monsanto analyzed 2,4 D acid samples produced by Dow from 2,4 DCP, 98% and a sample of 2,4 D acid produced by Fallek from Monsanto's 2,4 DCP, 93%. The results showed both Dow's and Fallek's 2,4 D acid to contain approximately the same amount of "free" 2,4,6 TCP (100 ppm). Since the uses of the two products are similar and Dow's product is considered non-hazardous, it follows that products manufactured from Monsanto's 2,4 DCP 93% are also non-hazardous.
- Continuing to offer 2,4 DCP, 93% to our customers poses no health hazard and will increase gross profit by \$700M to \$1000M per year.

Edwin L. Head
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