Message

From: WRATTEN, STEPHEN J [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=SJWRAT]
Sent: 4/8/2009 12:40:58 AM
To: ADAMS, STEPHEN A [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=113797]
Subject: RE: Off spec GI railcar

Probably the same as yours. What the hell is arsenic doing in there? How can 3 ppm impart a visible gray color? What is a DOE anyhow? Why did you look for arsenic anyhow?

Since GI is not a pesticide and therefore is not regulated strictly by FIFRA, an impurity in GI is not specifically a violation of anything that you manage. What will happen to it when the GI is oxidized to glyphosate? As it is an element, it cannot be destroyed, but perhaps it is precipitated or adsorbed to the catalyst or something? Or does it carry through to glyphosate as arsenate or something?

I mean, if we make a big deal about NNG at 1 ppm, my gut feeling is that arsenic is not necessarily any better to a casual observer. I would have to think it is inherently of toxicological significance (would any toxicologists say it isn't?), and therefore the blanket 0.1% default limit doesn't really apply, and we cannot just wave it away. I'm not sure if arsenate is a pesticide itself (some derivatives are herbicides like MSMA, but this is not precisely that). It may be that a more careful analysis can determine that at the levels present, it is not even close to a health risk, and so if this is a temporary event, perhaps the Chemical Stewardship team or similar can judge that it is OK.

I would not feel comfortable just telling Mfg to proceed and don't worry about it.

Steve

> **From:** ADAMS, STEPHEN A [AG/1000]
> **Sent:** Tuesday, March 31, 2009 12:10 PM
> **To:** WRATTEN, STEPHEN J [AG/1000]
> **Subject:** FW: Off spec GI railcar
> **Importance:** High
>
> what is your take on this Steve?
>
> <s>

From: AHLERS, ERIN M [AG/1000]
Sent: Monday, March 30, 2009 3:16 PM
To: GUGLIANO, PATRICK F [AG/1630]; KOCH, JOHN D [AG/1630]; SALL, ERIK D [AG/1000]; HARTMANN, GREGORY ALAN [AG/1000]; SCAIA, MARK D [AG/1000]; ADAMS, STEPHEN A [AG/1000]
Cc: WILLOZ, JOHN L [AG/1630]
Subject: RE: Off spec GI railcar
Importance: High

As I understand it, the biggest concern with Arsenic is from an IH perspective. By the time it actually works through the process the levels should be negligible.

Steve Adams – any concerns from a regulatory standpoint I have missed?

From: GUGLIANO, PATRICK F [AG/1630]
Sent: Monday, March 30, 2009 10:02 AM
To: KOCH, JOHN D [AG/1630]; SALL, ERIK D [AG/1000]; HARTMANN, GREGORY ALAN [AG/1000]; SCAIA, MARK D [AG/1000]
Cc: WILLOZ, JOHN L [AG/1630]; AHLERS, ERIN M [AG/1000]
Subject: RE: Off spec GI railcar

I'm forwarding to Erin to see if there may be any product stewardship issues.

Erin, please advise.

Pat

From: KOCH, JOHN D [AG/1630]
Sent: Monday, March 30, 2009 9:41 AM
To: SALL, ERIK D [AG/1000]; HARTMANN, GREGORY ALAN [AG/1000]; SCAIA, MARK D [AG/1000]; GUGLIANO, PATRICK F [AG/1630]
Cc: WILLOZ, JOHN L [AG/1630]
Subject: RE: Off spec GI railcar

Arsenic does not show up on any of the technical specifications.

From: SALL, ERIK D [AG/1000]
Sent: Monday, March 30, 2009 9:30 AM
To: KOCH, JOHN D [AG/1630]; HARTMANN, GREGORY ALAN [AG/1000]; SCAIA, MARK D [AG/1000]; GUGLIANO, PATRICK F [AG/1630]
Cc: WILLOZ, JOHN L [AG/1630]
Subject: RE: Off spec GI railcar

John

For what it is worth, I am not aware of any reason for concern. Is this OK in the Tech Spec?

Erik

From: KOCH, JOHN D [AG/1630]
Sent: Monday, March 30, 2009 9:25 AM
To: SALL, ERIK D [AG/1000]; HARTMANN, GREGORY ALAN [AG/1000]; SCAIA, MARK D [AG/1000]; GUGLIANO, PATRICK F [AG/1630]
Cc: WILLOZ, JOHN L [AG/1630]
Subject: FW: Off spec GI railcar

We have a GI car coming from lulling that has a low level of arsenic in it ~3ppm. I know we had a car or two in the past with low levels of arsenic in it and we approved using it.

I could not find the old emails regarding the previous use of GI with low levels of arsenic but I know this was discussed once.

Do any of you have any concerns with this going through the tech process???

Thanks, John

From: HOENIG, SALLY A [AG/1560]
Sent: Thursday, March 19, 2009 11:41 AM
To: MOURA, PAULO C [AG/1630]
Cc: WILLOZ, JOHN L [AG/1630]; KOCH, JOHN D [AG/1630]
Subject: Off spec GI railcar

We have a railcar that is off-spec due to appearance. The product has a slight gray appearance due to a low level of arsenic content. The result is 3 ppm arsenic.

We believe we're picking it up from the walls of the vessels. We're running a DOE that is causing the levels in our vessels to be higher than normal. We're doing this experiment in one reactor right now, but next week we'll be changing how we operate the other two reactors so they will also have higher levels.

The attached spec waiver is for the one railcar we have right now that is failed. There is a good chance we will have more next week when we switch the other reactors. What I would like to do for those is write another spec waiver to cover any remaining railcars and have it approved ahead of time so we don't have to hold railcars. We would notify you of any additional cars that are off spec and send you the arsenic results. We will also set an upper limit on arsenic for the spec waiver, but we are still we're trying to determining what that should be. I just wanted get your thoughts on whether you would support doing a blanket waiver.

If you approve the waiver that is attached, please reply to this email.

If you have any questions or need additional information, please let me know.

Thanks,

Sally