

bcc: R. N. Brell-RBREL
J. M. D'Angelo-Atlanta
W. B. Papageorge-WPAPA

January 21, 1971

Mr. Hugh W. Lowrey
Director of Manufacturing
Indurall Coatings, Inc. *AP*
3333 10th Avenue, North
Birmingham, Alabama 35201

Dear Sir:

Thank you for your inquiry concerning our polychlorinated terphenyl products and their status with the U. S. Department of Agriculture. As you might imagine, we are quite concerned with the wording of PR notice 70-25 and have discussed this with the authors of that notice.

Early in 1970 Monsanto, after having carried out extensive evaluations of PCB's and their effect on the environment, came to the conclusion that PCB's did indeed have a detrimental effect on the environment and that they should not be sold into open system applications. At this time we requested in writing, that the U.S.D.A. cease to register insecticides containing PCB's. Further, as you know, we withdrew PCB's from plasticizer areas. Parallel to this study of PCB's, we have tried repeatedly to find some evidence that PCT's (polychlorinated terphenyls) had some ecological significance. At the time that we reached our decision to withdraw PCB's from the market, we had not uncovered any evidence that PCT's were even found in the environment. At the time of this writing, we have still not found any evidence that PCT's can be found in the environment, in spite of the fact that our search has continued, if not intensified.

When the U.S.D.A. PR notice 70-25 was published stating that "there are accumulating data on the chronic toxicity of the polychlorinated biphenyls and polychlorinated terphenyls to fish and birds and the contamination of the environment by these chemicals" Monsanto stated to the U.S.D.A. that if such data existed it would certainly be in the best interest of all concerned to publish the data. The U.S.D.A.'s response was that no data on polychlorinated terphenyls actually existed; that a quick look at the chemical structure indicated that the two products were chemically similar and therefore would be considered as one with respect to ecological problems.

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As stated above, Monsanto's extensive search for PCT's has not shown these materials to be present in the environment. Further, we believe that there are definite reasons which could explain this - such as the extremely low solubility of these products in water. Accordingly, Monsanto is preparing a formal complaint to the U.S.D.A. protesting its hasty publication of statements concerning polychlorinated terphenyls and their lack of ability to be able to back up their claims.

I hope this rather lengthy statement adequately explains our stand on U.S.D.A. PR notice 70-25. If you desire additional information on this subject, please do not hesitate to contact us.

Very respectfully,

Willis S. Clark
Product Specialist, Plasticizers

WSC/gls