PCB file

Note - This letter needs
RB.

DRAFT - 2/17/76 -- Thomas J. Downey Letter

Dear Mr. Downey:

Thank you for your letter of January 30 commending Monsanto for its intention to phase out of PCB production. We have tried to act in a responsible manner and I appreciate your kind remarks concerning our efforts.

With regard to your question concerning an approximate timetable for the PCB phase out, I need to make several observations. First, any such timetable for switch over to substitutes must finally be determined by the using industries rather than by Monsanto as the manufacturer of the material. Estimates on the part of capacitor manufacturers, for example, of the time they would like to have for conversion range as high as 36 months. However, I believe that if current substitute products prove serviceable, the conversion in the capacitor field can be made within 18 months. It may take longer for conversion of transformers -- possibly another six to ten months.

Dealing next with the issue of substitute materials, we must realize that almost any of them will be less effective than PCB's in some respects -- most likely in presenting an increased fire and/or ~~explosive~~ explosion hazard. Some degree of compromise on this point will obviously have to be accepted. ~~as we terminate the use of PCB's~~. Also, we must separate capacitors from transformers in our consideration. ~~as~~ No single substitute is likely to satisfy both end users.

We have a class of substitute materials for dielectric use in capacitors

that:

1. function effectively
2. are biodegradable, that is, they break down in the environment, and
3. can probably be considered as a relatively low fire risk but by no means non-flammable.

Further, based on preliminary testing, they seem to pose no safety hazard assuming, of course, they are handled properly by the users. These products, while chemically related to the PCB's, eliminate the chlorine derivative component of PCB's which is generally regarded as a "bad actor."

The completion of ~~preliminary~~ safety testing by us and our customers and the insurance industry's willingness to compromise ~~somewhat~~ on fire safety standards will ~~really~~ determine the timetable for conversion from PCB's, ~~at least as they are used in capacitors.~~

With regard to ~~alternatives for~~ transformers, other materials in addition to our products are being examined, including ~~silicons and probably even~~ changing the physical housing of certain types of transformers by encasing them in concrete block houses, ~~etc.~~ We don't have nearly as good an answer for the transformer industry, ~~where often~~ gallons of fluid are used in a single installation, as opposed to a mere fraction of that amount in ~~the case of~~ capacitors. Hence, the conversion of this industry may take longer.

I hope my comments are helpful. For over five years we at Monsanto have tried to deal with this knotty issue in a manner responsible to the environment, the public and the industries which have depended on our fluids to

help power the U.S. You may be assured we will continue to do so.

Sincerely,

MONS 094629