April 13, 1970

Dr. Harry W. Hayes
Director
Pesticide Regulations Division
Agricultural Research Service
U. S. Department of Agriculture
Washington, D. C.

Dear Dr. Hayes:

Perhaps you are familiar with the current widespread interest in polychlorinated biphenyls and their reported presence in the ecosystem. There are a number of publications that indicate one possible source is the use of these materials in pesticide formulations.

In the early 1950's there were several publications (see enclosed copies of two) which indicated that "chlorinated polyphenyls" improve the residual effect of lindane and possibly chlordane. To our knowledge there was never any recommendation by anyone for their use on food or other crops. The principal application was to spray metal or painted surfaces to increase the effectiveness of the active pesticide against flies, ants, roaches, silverfish, etc.

For a number of years our technical bulletins contained references to reports by U. S. Department of Agriculture scientists that this type of application improved the residual characteristics of insecticides. To our knowledge this usage of the chlorinated biphenyls never developed to a significant degree.

Perhaps you are aware that Monsanto is the sole producer of polychlorinated biphenyls in the United States. Our products are trademarked Aroclors. The polychlorinated biphenyls are represented by our Aroclor 1200 series, e.g. Aroclor 1254 is biphenyl chlorinated to the extent of 54%.

It is possible that some pesticide formulators are purchasing from our distributors our chlorinated biphenyls for inclusion in their formulations. In view of the concern over the presence in the environment of persistent chlorinated hydrocarbons, we believe that the chlorinated biphenyls should no longer be used in such formulations.

We ask, therefore, as your department considers the re-registration of pesticide formulations, that critical attention be given to the presence of these materials.

We will be happy to discuss this further with you either by letter or personally.

Very truly yours,

R. Emmet Kelly, M. D.
Medical Director

REK:ju

Enclosures