H.S.Bergen
C.P.Cunningham/
W.R.Corey
W.B.Papageorge
P.S.Park
E.P.Wheeler/R.E.Kelly

XCB-Gen'l Corr

Monsanto

MONSANTO INDUSTRIAL CHEMICALS CO.
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Phone (314) 694-1000

November 15, 1971

Mr. Paul J. Leach
Executive Director
Michigan United Conservation Clubs
P. O. Box 2235
Lansing, Michigan 48911

Dear Mr. Leach:

I have been asked by Mr. Bock, President of Monsanto, to thank you for your letter on PCB's and to respond. I hope you will accept my personal apologies for the long delay in reply.

We fully appreciate and share your concern as to the effects of PCB's on the environment and fishing resources of this country. During the past two years Monsanto has taken a series of actions which, we believe, will reduce significantly the chances of PCB's escaping into the environment. In summary these are as follows:

1) We have discontinued sales of PCB's for all open system applications where disposal of the end product could result in further build up of the PCB's in the environment.

2) We have phased out PCB's as components of industrial and hydraulic fluids where control of spent fluid and collection of spilled material is not possible.

3) Although we are continuing to sell PCB's as dielectric fluids for transformers and capacitors, we are cooperating closely with our customers in

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the collection of spent and arced fluid for incineration or regeneration at our St. Louis plant. The valuable fire-resistant properties of the PCB's make them a key material for the production of transformers and capacitors where human safety and fire protection are extremely important.

4) Our sales of the PCB's as fire-resistant heat transfer fluids have been restricted to those areas where we believe there is a minimum chance of their either escaping to the environment or entering the food chain. In addition, we are refusing to accept any new business in this area and are restricting our sales to replacement material for existing systems.

5) We have carried out an extremely detailed research program aimed at developing alternates to PCB's and also modifying the PCB's to improve their degree of biodegradability in waste treatment facilities. Our aim here is not to develop PCB's which can be allowed to escape into the environment but rather to produce it so that, in case of accidental spillage, it will be capable of being caught and degraded in waste treatment facilities.

Enclosed you will find further information describing these actions and others which Monsanto is taking to control the escape of these materials.

We believe these actions have reduced significantly the potential for PCB contamination of the environment, although we are extremely conscious that there are still isolated cases where accidental spillage of these materials can cause contamination of animal feed stuffs and pollution of lakes and streams. Our objective is to continue our work, both alone and in conjunction with the Joint Federal Agency Task Force, to eliminate all possibility of such accidents occurring in the future.

You may ask, "Why not discontinue the manufacture and sale of these products completely?". The answer is that in

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certain closed system applications, such as capacitors and transformers, the stability of the PCB's at high temperatures and their fire-resistant properties are vital in protecting public safety. At this time there are no alternative materials available which possess the unique combination of properties of the PCB's. The electrical industry, Monsanto, and other chemical companies have already spent significant time and effort in looking for alternates which would not create environmental problems in case of accidental leakage or loss. At this stage these efforts have not been successful but the search will continue and I am confident that substitutes will be found in the future. In the meantime, we believe that our policy of restricting sales to vital closed systems, collecting and incinerating used fluid, and working with our customers to handle the product correctly to avoid spillage and discharge to the environment is in the best interest of the general public.

It is extremely difficult to give a clear answer to your question, "Should fishermen be fishing--and is it detrimental to consume the fish they take?". As I indicated to you during our telephone conversation, full research on the toxicity and possible long-term human health hazards of the PCB's has not as yet been completed. However, Monsanto has recently completed a series of two year animal studies which has given us a considerable amount of information and additional work is now being carried out by certain of the Federal agencies. I am attaching hereto a copy of a press release issued by the FDA and other Federal agencies covering the present status of the PCB problem. I particularly draw your attention to the statement made by Dr. Albert C. Kolbye, Jr., Deputy Director, Bureau of Foods, Food and Drug Administration. This is an excellent summary of our present state of knowledge on the toxicity of PCB's and their likely affect on individuals eating contaminated food. I think it indicates clearly that short-term dangers associated with eating foods contaminated with PCB's are unlikely to cause problems but continued intake of contaminated food over a long period of time should be avoided.

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As you may already be aware, the members of the Governors' 5-State Interdisciplinary Council held a meeting on September 30 to consider the problem of PCB's in the lakes and streams located within their states. This meeting was attended by Dr. Kolbye of the FDA and Monsanto was also represented. I am enclosing a copy of a statement made by this Council and particularly refer you to comments made under Item #2.

Although I recognize this letter does not completely answer all the points you've raised, I hope the information given will convince your members that Monsanto is taking responsible action to alleviate this problem. We will continue to work closely with Federal and State agencies and other responsible scientists to ensure that we can obtain the maximum degree of control over the usage and disposal of these chemicals.

If there is anything further we can do to assist you and the members of the Michigan United Conservation Clubs we will be only too delighted to help. As I mentioned during our telephone conversation, Mr. William B. Papageorge, Manager of Environmental Protection, Monsanto Industrial Chemicals Company, would be more than pleased to attend one of your future meetings to discuss the subject of PCB's with your members and to answer any questions you may wish to pose. If this subject is of interest to you perhaps you could suggest a convenient date to your members.

Yours sincerely,

John Mason
Group Director
Functional Products Groups

/jf

Enclosures

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