

cc: P. G. Benignus
W. B. Papageorge - RZWA
J. O. Bryant - 1650
P. L. Slayton - 1650
W. K. Easley - 1920✓

February 28, 1973

Mr. Dick Pilsetnieks
Burroughs Corp.
P. O. Box 472
Piscataway, New Jersey 08854

Dear Mr. Pilsetnieks:

Further to our conversation regarding the internal directive that Burroughs Corporation discontinue the use of polychlorinated biphenyls (PCBs), I enclose copies of literature to which I referred. One copy is the U. S. PCB Task Force report supporting the continued use of PCBs in capacitors and transformers and recommending a ban on the use of PCBs in non-dielectric applications. This report in essence endorsed the voluntary restrictions on PCB sales that Monsanto had voluntarily put into effect. Today Monsanto sells PCBs only to approved original manufacturers of dielectric equipment such as capacitors and transformers.

The second copy is a Monsanto presentation to the PCB Task Force on the biodegradation of PCBs. As a result of our research into the biodegradability of PCBs, Monsanto introduced Aroclor 1016 as a PCB capacitor fluid in the fall of 1971. At least 99.8% of PCB capacitors made in the U.S.A. and Canada now use Aroclor 1016 which contains significantly lower levels of penta- and higher chlorobiphenyl homologs than previously used PCB capacitor fluids. We have discontinued the use of Aroclor 1260 from our PCB-containing Inertcon and Pyramel askarel transformer fluids. These fluids now use PCBs which have lower hexachlorobiphenyl levels than Aroclor 1260.

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In the speculation that your company's concern on PCBs is related to announcements on PCB restrictions in Japan the following information may be helpful.

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A sector meeting of OECD took place in Paris in October 1972 and recommended that the use of PCB's in capacitors and transformers continue. It is my understanding that delegations from some OECD countries were alarmed about possible non-tariff trade barriers that could arise because of non-uniform application of PCB restrictions. Japan is a member of OECD. It is unclear to me at this time whether the Japanese actions are in total accord with OECD policy. It is my understanding that PCB is banned for use in Japan, banned for import or export, except under special license granted from the Japanese government. If OECD and Japanese developments are of concern to you I would suggest you contact the following, in order:

1. Mr. Lowell E. Miller
Environmental Protection Agency
(802) 755-0330

Mr. Miller was the U.S. delegate to the OECD Sector group meeting on PCBs in Paris.

2. Dr. Warren Mair
Council of Environmental Quality
(802) 382-7034.

To prepare yourself for meetings with either of the above gentlemen you may wish to contact our Director of Governmental Affairs in Washington, Mr. Warren K. Hesley. (802) 296-0050. Warren is very knowledgeable on the PCB issue and how the various government agencies have been involved in it.

I also enclose a copy of the final Environmental Impact Statement Rule Making on PCB's published by F.D.A. on December 18, 1972. While this document addresses itself to PCB's in animal feed, feed packaging and feed establishments, it is of importance to note that "the use in these establishments of electrical transformers and capacitors that contain PCB's are not expected to cause the contamination of (these products) and are exempt from the above mentioned provisions." (See pages 14, 15, 16.)

Mr. Dick Pilsetnieks

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Monsanto has ongoing research programs on PCB replacements for capacitors. Naturally any likely replacements would have to undergo strict environmental acceptance testing in addition to normal, lengthy performance testing to qualify, in our view, for serious consideration as a PCB replacement. These requirements therefore stretch out the period before any promising laboratory candidate could become a commercial reality.

I hope this information is helpful. If we can be of further assistance to Burroughs Corporation, please do not hesitate to contact us again.

Very truly yours,

Cumming Paton
Product Manager
Fluids

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P. S. - Finally, there is another attachment enclosed. This is a summary of the activities of ANSI C-107 Committee on PCBs. C-107 was set up by ANSI (American National Standards Institute) to be a source of technical information on PCBs as dielectric fluids; to develop suitable disposal facilities; and to serve as the U.S. advisory group in international organizations representing the electrical industry. The secretary of C-107 is Mr. A. M. Salazar of NEMA. You may find the attached summary of their activities useful in evaluating your position on the use of PCBs in capacitors.

C. P.

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