

Monsanto

FROM
(NAME-LOCATION-PHONE) J. H. Craddock - B3NA (4-4764)

DATE January 25, 1984

SUBJECT PCB Info By Chemtrec

REFERENCE

TO : S. H. Brand - M3A

E - make a copy in HQ - please

~~D. R. Bishop - E3EE~~
J. G. Nassif - E2ND
W. B. Papageorge - B3NA

Re your recent note about input to Chemtrec for their PCB data sheet, at this point I don't know of any changes we should recommend to the current sheet. Within the past 10-12 months, as a member of the CMA PCB Panel and chairman of the Health and Toxicity Subcommittee on PCB, I have reviewed and suggested changes in the Chemtrec document and it looks like they have responded.

The Chemtrec PCB document information now parallels the Monsanto generic PCB Material Safety Data Sheet (copy attached).

Confusion does occur among many disciplines, including the media and public, as to what happens to various commercial PCB containing products in misuse situations. A good example is electrical fires and possible formation of toxic contaminants from various equipment ingredients which may include PCBs, and other adjacent materials that may be combustible including wiring, paint, building materials, etc.

Monsanto has taken the position that we will and do provide data regarding PCBs we manufactured. Other products such as transformer and capacitor fluids, etc., were formulated, manufactured, sold, patented, etc., generally by electrical equipment manufacturers. Certainly the responsibility for use of such fluids and providing information about its use and safety lies there.

Among the misconceptions about PCBs is the allegation that PCB fires result in dioxins. This is incorrect. EPA data demonstrates that in electrical fires pure PCBs don't form dioxins. Other components of the dielectric fluid, i.e., trichlorobenzenes, cause dioxins.

Some commercial PCBs contained incidental PCDF's at very low levels (up to 20 ppm). Monsanto Aroclor® PCBs are recognized as being the purest in the world. The PCDF content of Aroclors, according to the recent National Academy of Science publication "Polychlorinated Biphenyls" (1979), ranged from 0-2 ppm, a level that is insignificant in comparison to levels found from combustion generation of these compounds in fires.

The issue of PCBs, dielectric fluids (and other formulations) and fires is very complex. We have taken a sound scientific position based upon our products and intended uses. We can't respond for all other products which possibly contain many other chemicals that have significantly different properties and could and do lead to other problems and issues depending upon

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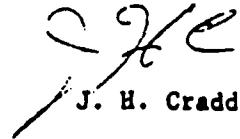
S. H. Brand

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their use or misuse. Although we don't seek to respond to all such problems, we will and do respond routinely to legitimate requests for information about PCBs and possible effects in all sorts of uses and situations, including health and safety emergencies, based upon analysis of the known facts. There is no way to simplify our current MSDS type information more to cover all issues.

If you have other questions, I'd be happy to discuss this issue in depth at your convenience.


J. H. Craddock

/dg

Attachment

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