BCC: J. MASON - JMASO
H. S. BERGEN
E. P. WHEELER - EWHEE
J. D. EARLY - WASHINGTON
W. S. CLARK - WCLAR

February 10, 1971

Mr. Lowell E. Miller, Director
Pesticide Regulation Division
Environmental Protection Agency
South Agricultural Building
Washington, D.C. 20250

Dear Mr. Miller:

I recently noted in United States Department of Agriculture PR Notice 70-25 dated October 29, 1970 that polychlorinated biphenyls must be eliminated from economic poisons. We at Monsanto understand and are in complete agreement with this action as indicated in correspondence Dr. R. E. Kelly, Monsanto's Medical Director, had with Dr. Harry W. Hayes and Dr. C. Cueto, Jr. when the Pesticide Regulation Division was part of the U.S. Department of Agriculture.

I am deeply concerned, however, to note that this elimination has been extended to include the polychlorinated terphenyls. We have thoroughly searched all available literature and communicated with many laboratories, industrial, academic and regulatory, and been unable to find evidence that would indicate the polychlorinated terphenyls are contaminating the environment or that they are responsible for adverse effects on fish or wildlife.

We realize the importance of preventing the contamination of the environment but seriously question whether the polychlorinated terphenyls can be properly classified as contaminants. Does your division have available any information or data which would justify the elimination of these materials from economic poisons?

Sincerely,

W. B. Papageorge
Manager
Environmental Control

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