April 2, 1969

REPORT AND COMMENTS ON MEETING ON CHLORINATED BIPHENYLS
IN THE ENVIRONMENT AT INDUSTRIAL BIOTEST LABORATORIES,
CHICAGO, MARCH 21, 1969

Robert L. Metcalf U of I.C. Consultant [illegible]

From the background data presented it appears that something of the order of 80 million pounds of polychlor biphenyls (PCB) are produced annually. These products contain from 3 to 9 chlorine atoms per molecule and become increasingly inert and stable to environmental oxidation with higher degree of chlorination. However, about half the production is in the 3-chlorine atom variety (Aroclor 1242).

At first thought it seems unlikely because of the major uses of PCB in capacitors, transformer oils, heat transfer fluids in closed systems, that these materials could be the source of the substantial degree of environmental contamination reported. However, about 40 million pounds annually is stated to be used as plasticizers, hydraulic fluid, adhesives, and in carbon paper. From this amount a very substantial percentage must escape into the environment as waste. Because of the apparent high stability of PCB, amounts entering the environment would be degraded very slowly and it seems possible that at least 10million pounds annually may become environmental contaminants. Since the PCB's were introduced commercially in 1929 there have been 40 years of production. If this has averaged 50 million pounds per year, then about 2×10^9 pounds have been made and perhaps 2×10^8 pounds have entered the environment. Because of the apparent stability of these compounds most of this amount may still be circulating in the global ecosystem and this is suggested by the levels reported by Holmes et al. (1967) and Risebrough et al. (1968) in animal tissues which are quite comparable to those found for DDT. Both PCB

DEFENDANT'S EXHIBIT #22

and DDT are extremely stable and water insoluble and have been produced in roughly the same total amounts over the past 30 years.

Thus it seems quite reasonable to conclude that the environmental contamination described for PCB is due to waste amounts of these compounds. This, coupled with the thorough evidence from mass spectometry strongly suggests that there is an important environmental quality problem involved in wastes of PCB.

Experimental Work Planned at Industrial Biotest.—

This laboratory is highly experienced and seems quite competent to provide standard data required by FDA for evaluating the safety (or hazard) of agricultural or industrial chemicals. The long term feeding studies on rats and dogs will doubtless serve to indicate the chronic toxicity hazards of chronic ingestion of the PCB at ppm levels and this will almost certainly result in severe liver damage at some reasonable level. The chicken reproduction investigations at 0.01, 1, 10, and 100 ppm should be considerably more meaningful particularly in regard to studies of egg hatchability, shell thickness, etc.

While the fish toxicity investigations will be interesting, I cannot see that they are particularly relevant or necessary at this time and I would think this data could be obtained from Fish and Wildlife investigations, etc., and will undoubtedly be forthcoming, unsolicited.

Conclusions and Suggestions.—

It seems to the writer that the evidence regarding PCB effects on environmental quality is sufficiently substantial, widespread, and alarming to require immediate corrective action on the part of Monsanto. The defensive measures presently underway will do little if anything to

WATER_PCB-SD0000054933

refute the evidence already presented. I would suggest the following:

1. A substantial analytical program to monitor air and water effluents from Monsanto plants producing PCB and also those of major customers.

2. Prompt correction of effluent conditions where PCB can be demonstrated.

3. Serious consideration of curtailing sales of PCB for uses such as plasticizers, adhesives, and carbon paper where waste is certain to enter environment.

4. Review of disposal and recovery methods for PCB in capacitors, transformers, heat transfer fluids, and hydraulic fluids. Emphasize to customers importance of preventing environmental contamination.

5. Thorough investigation of environmental fates of various PCB's including photochemical oxidations, chlorination in water systems, etc.

6. Biochemical and electron microscopic study of levels of PCB ingestion which cause proliferation of endoplasmic reticulum and induction of multifunction oxidases in chickens and rats (perhaps these are partially included in present Industrial Biotest experiments).

7. Begin investigations of possible biodegradable substitutes for PCB's as plasticizers, adhesives, fire resistant hydraulic fluids, etc., anticipating loss of these markets as a necessary corollary of environmental problems. Are, for example, chlorinated diphenyl oxides or diphenyl sulfides suitable for these uses. They should be considerably more biodegradable.

WATER_PCB-SD0000054934