July 24, 1970

Cipriano Cueto, Jr., Ph.D.
Chief Staff Officer
Safety Evaluation Staff
United States Department of
Agriculture
Pesticides Regulation Division
Washington, D. C. 20250

Dear Dr. Cueto:

In reply to your recent letter concerning our recommendation that the use of polychlorinated biphenyls in pesticide formulations be discontinued, I believe the attached literature references and our company's brief discussion of the PCB as a possible environmental contaminant explain our request.

You will note that our voluntary program to control the escape of the PCB's to the environment includes our decision to discontinue sales of the PCB's for all uses other than as fire resistant fluids in closed systems. The fact then is that no insecticide formulator will be able to purchase PCB's from our company either directly or through distributors in the future.

The above action has no relation to any human toxicity of the compounds. As far as chloracne in workers or users is concerned, we have had reports of only two isolated instances of chloracne in the last fifteen years. Neither occurrence was of any great importance and resulted from failure to follow recommended safe handling procedures.

If I can be of any further assistance, please let me know.

Sincerely,

R. Emmet Kelly, M. D.
Medical Director

REK:ju

b.c. J. Mason
W. B. Papageorge
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