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BODEGA MARINE LABORATORY

P. O. BOX 247
BODEGA BAY, CALIFORNIA 94923

October 25, 1971

Mr. W. B. Papageorge
Manager, Environmental Control
Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

Dear Mr. Papageorge:

Public interest in PCB and the effects of environmental contamination by PCB has evidently increased since your visit to our laboratory in Berkeley.

Among the current research priorities of pollution ecologists is the determination of accumulation rates and mass balance equations of PCB in "sinks" such as the oceans. An approach to the formulation of a mass balance equation for the DDT compounds in the oceans was made in a recent publication of the National Academy of Sciences entitled "Chlorinated Hydrocarbons in the Marine Environment". The problem is now of crucial importance since it is possible that the amounts of PCB already manufactured and that will be released eventually into the environment are sufficient to increase PCB concentrations in marine fish of the coastal waters beyond acceptable limits.

In a letter of April 6, 1971 to Dr. S. G. Herman in response to his request for information about PCB production figures in the United States you wrote:
"Regarding your question of divulging sensitive marketing information, I regret I cannot help you. We believe the information would be of extremely limited value since the PCB problem is worldwide and there are producers in Germany, France, Italy, Spain, Japan, Poland, Czechoslovakia and Russia. We also believe we have a responsibility to our employees, shareholders and in some cases to our customers to preserve the business while taking responsible action to reduce PCB contamination".

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We currently have some information about PCB production figures in Japan which are sufficiently high to indicate that knowledge of production figures in other industrial countries is badly needed if we are to predict future levels of oceanic contamination.

In addition to your responsibility to your employees, shareholders and customers, there is also an evident responsibility to all other persons who may eventually be affected by PCB contamination of the environment.

The Monsanto Company has made several commendable steps in recognizing the environmental hazards of PCB and in reducing the input of PCB to the environment. Contrary to the announcement by Monsanto, however, that PCB useage would be restricted to closed-system applications, PCB has continued to be used in various paper products until it was found that foods were becoming contaminated with PCB from recycled paper. Moreover, some of the closed systems have an evident tendency to leak.

If input of PCB into the environment could be substantially reduced so that steady state levels were considerably below those now found in our coastal waters, there would be no need to call for a complete ban on the use of these chemicals. But we can not adequately protect the environment unless it is possible to relate production figures and environmental input to contamination levels in fish and other components of the biosphere. To do this it is absolutely essential that production and use figures be made public.

I hope that Monsanto will agree to cooperate with the environmental science community to protect what is evidently the public interest.

Very truly yours,

Robert W. Risebrough
Associate Research Ecologist

cc: Professor E.D.Goldberg
Professor H.S.Olcott
Senator Gaylord Nelson
Senator George McGovern
Mr. Michael Palmer, Environmental Defense Fund