Monsanto

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October 17, 1975

Mr. Jeffrey A. Tannenbaum
Staff Reporter
The Wall Street Journal
22 Cortlandt Street
New York, New York 10007

Dear Mr. Tannenbaum:

We wish to comment on a misleading aspect of your article on the polychlorinated biphenyl dilemma as it appeared in the October 10 edition of The Wall Street Journal.

Under the sub-heading, Many Buyers Eliminated, you stated, "The controls were instituted in the wake of a 1972 report by a federal government task force that urged that PCBs should be restricted to essential or non-replaceable uses which involve minimum direct human exposure, since they can have adverse effects on human health. The sole U.S. producer, Monsanto Co., voluntarily stopped selling the chemicals to 'several thousand' customers -- all except users with 'closed system' electrical applications."

This paragraph is misleading in that it infers that Monsanto took no action with regard to PCBs until 1972 and then only "in the wake of a report by a federal government task force." We can only speculate that you were probably misled by conflicting (and inaccurate) information you subsequently received from the U.S. Environmental Protection Agency. We have reviewed a copy of the EPA's Environmental News Release on PCBs, dated October 8, 1975, which reads in part, "Monsanto Industrial Chemicals Company, the sole U.S. producer of PCBs, agreed in 1972 to limit its PCB sales to manufacturers of these 'closed' electrical systems."

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This is simply not true. As we discussed with you during the telephone interview on August 14, 1975, and further documented in the literature we supplied at your request, Monsanto began its program of withdrawing, voluntarily and unilaterally, from "open system" markets in 1970 (see attached Monsanto News Release dated July 15, 1970). Furthermore, by December 31, 1971, this program was fully implemented and Monsanto was selling PCBs only to the electrical industry where they were (and still are) used as dielectric fluid in "closed systems" such as transformers and capacitors where there are no known, acceptable alternate fluids available.

As further documentation, we have enclosed a copy of a May 3, 1971 editorial from Chemical & Engineering News Magazine that discusses Monsanto's then ongoing and voluntary curb of sales of PCBs. Another reference is contained, interestingly enough, in the 1972 federal task force report to which both you and the EPA have referred. On page 2 of that report, under the heading, Findings, Conclusions and Recommendations, the report credits Monsanto with taking voluntary action in 1971 to reduce volume and limit distribution. You should also know that the federal task force not only reviewed and approved Monsanto's program but firmly endorsed the continued use of PCBs in closed system electrical applications, as well.

Given these facts, we really do not understand why the Environmental Protection Agency has failed to give Monsanto proper credit for what has been otherwise and universally regarded as a unilateral, voluntary and highly responsible action but that is not the issue here.

We hasten to add that we do not believe that you or The Wall Street Journal deliberately attempted to leave a false impression in this matter. We simply believe that, given conflicting information by the EPA, Monsanto should have been given the opportunity to refute it as we have clearly done here, unfortunately after the fact.

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The attached "Letter to the Editor of The Wall Street Journal" addresses itself to this point.

We welcome further discussion on this subject and would appreciate any effort on your part to set the record straight.

Sincerely,

D. R. Bishop
Director, Public Relations
MICC

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Attachments

cc: Honorable Russell E. Train
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