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On February 24, the San Francisco Chronicle carried a major feature about "a menancing new pollutant" found in the San Francisco Bay area. The article was based on marine life research carried out by Dr. Robert Risebrough of the University of California. It stated that residues of polychlorinated biphenyl (PCB) were killing certain marine birds and posed a long-term threat to humans.

This story has caused considerable comment on the West Coast and its claims may be repeated elsewhere. As you know, Monsanto manufactures polychlorinated biphenyl and markets it under our Aroclor trade name. We, therefore, would like to present some additional facts.

The work done by Dr. Risebrough dates back to earlier research by other scientists to analyze the amount of pesticides in wildlife, soil and water. The initial pesticide research was extremely difficult since any search to detect materials in the parts-per-billion range also brings out other "interferring" substances.

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Several years ago, two Swedish scientists at Stockholm University's Institution of Analytical Chemistry, Professor Gunnar Widmark and Soren Jensen, reported they had identified the other substances which were appearing during analysis of chlorinated pesticide residues. They said some of the materials were polychlorinated biphenyls or PCB. The amount reported was in the parts-per-billion range, or less. Since PCB's are not "broadcast" or spread around the land as are pesticides, the scientists theorized that the source must be the industrial wastes of PCB users.

Dr. Risebrough's more recent work reports the identification of PCB, along with DDT and DDE pesticides, in the tissues of birds and fish on the West Coast.

The conclusionsof these scientists are puzzling from several aspects. Polychlorinated biphenyls are stable chemical compounds which are essentially insoluble in water. Their use does not make them easily released into the natural environment.

A principal market for PCB is in electrical applications where they are used as insulating fluids for transformers and capacitors. In this use, the chemical is completely sealed in metal containers. Another market is for heat transfer applications where the PCB fluid functions in a closed system.

PCB's are also used in several "plastic type" applications. Here the chemical is incorporated into the polymer as an integral part of the solid material. This applies whether the polymer is used as an adhesive, an elastomer or a surface coating.

The Swedish and American scientists also imply that polychlorinated biphenyls are "highly toxic" chemicals. This is simply not true. The toxicity of any material, whether it be chemicals, drugs, natural plants or even foods, is relative. Compared to the thousands of industrial chemicals and home products, PCB's are not toxic unless they are mishandled or misused. During more than thirty years of U.S. production and use, cases of any toxic effect have been extremely rare -- and then only where the simple precautions recommended for use were not followed.

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To our knowledge, polychlorinated biphenyls are not sprayed or dusted on crops, woodlands or any other areas, as are pesticides. It is, therefore, not only puzzling, but extremely difficult to conceive how commercially produced PCB can show up in wildlife as DDT and other pesticides appear to be. This raises the question whether the substance identified in the Swedish work, and now in California, is actually PCB -- or whether they are materials which, due to the metabolism of other materials in the marine environment, appears to be PCB.

Unfortunately, even though techniques for analyzing tissue samples have become quite precise, the ability to analyze the possible impact of naturally occurring substances in the food cycle of living organisms has not made comparable advances.

Monsanto has a research program to confirm the identity of the compounds reported to be PCB by the Swedish and California scientists. We also cooperate, on a regular basis, with federal, state and university laboratories in their analysis of chlorinated hydrocarbon residues.

Additionally, Monsanto will continue to exercise the highest degree of control in its manufacturing, shipping and storage of PCB -- as we do with all products. In the functional fluids market, we have carried out a program for several years for the reclamation of used PCB's to avoid disposal of these valuable materials.

The source of the marine life residue identified as PCB is not yet known. It will take extensive research, on a worldwide basis, to confirm or deny the initial scientific conclusions. We will keep you advised of our own research and are available to answer questions as they may arise.

Very truly yours,

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