February 19, 1971

Mrs. Jayne Gaillard
5517 Richmond Road
Mobile, Alabama 36608

Dear Mrs. Gaillard:

Your letter addressed to our New York office has been passed on to me for reply. I assume your letter was prompted by a recent television show concerning PCB which received considerable air time on Gulf Coast channels. Unfortunately I did not see the show and, therefore, cannot comment on its accuracy. I can tell you of the voluntary actions Monsanto Company has taken to control escape of PCB to thenenvironment. I hope, after reviewing our program, you will agree our efforts reflect a responsible attitude.

Let me begin by clarifying some false reports and myths about PCB (initials for polychlorinated biphenyl) you may have read or heard. PCB is not an insecticide nor is it used in insecticides; PCB does not cause birth defects; PCB is not widely used in household products; PCB is not a highly toxic material -- it requires no toxicity labeling when shipped in interstate commerce; PCB is not harmful to man or other mammals in the quantities found in nature.

In 1966, two Swedish scientists in an attempt to measure DDT in the environment, encountered "interfering substances." They later identified these substances as PCB. Their work was published in 1967 and late the same year Monsanto began to review and evaluate it. Since the method of correctly identifying chlorinated hydrocarbons in nature was not fully developed at that time, Monsanto began a program to correctly identify and measure these substances. This work resulted in the development of a methodology which subsequently has been offered to and used by many scientists throughout the world.

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PCB is an industrial chemical first produced by Monsanto 40 years ago, in this country, and later by other corporations in other countries. It was first used as a coolant in heavy duty electrical equipment. This has always been the major use, even to this day. The fluid is sealed into an electrical transformer where it performs its function for 20 years or more. This application is what we call a "closed system."

In the early 1960s we suggested -- through our product literature -- that PCB could be used in other applications such as specialty paints, adhesives, chlorinated rubber, sealants, etc. These we call "open systems."

When Monsanto became aware, from the Swedish work, PCB could be getting into the environment, we began our environmental control program consisting of: 1) Proper identification and measurement of the extent of the problem; 2) Tightening up of our manufacturing processes to control escape; 3) Alert all customers to the potential environmental problem and insist on proper handling and use of the material; 4) Began research to develop suitable substitutes for PCB -- some of these have already been introduced; 5) Discontinue all sales of PCB into "open-system" applications; 6) Through research, look for ways to make PCB biodegradable; 7) Offer all customers a reclamation and disposal service where all used PCB is returned to us for recycling or disposal via an incinerator which breaks it down into harmless materials, and 8) Began long-term feeding studies to accumulate extensive toxicity data and determine the long-term affect of this substance on animals.

You are probably correct in saying our financial statement would not be hurt substantially if we quit making PCB. But that is not really the issue. At present, there is no suitable substitute for PCB in electrical equipment. Previous to PCB, this equipment was cooled with oil -- a highly flammable product. You may recall reading news stories about fires caused by exploding electrical transformers or other equipment. More important, human lives have been lost in these disasters over the years. I know of one example from personal experience where a man was killed in just this way. Many state and local laws throughout our country require the use of fire-resistant fluids in electrical equipment when this equipment is used where people may be working or gathering.

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For these reasons, we believe the course we have chosen is not only responsible, but also will provide people with the safety features PCB offers.

Our action is based on evidence that PCB is a persistent chemical which builds up in the environment. It is a program we have undertaken voluntarily without pressure from legislation or organized groups.

You will probably agree our program and success at controlling escape of PCB to the environment has been overshadowed by scare tactics and sensational reporting. That is why we appreciate the opportunity to explain our efforts to concerned individuals like yourself.

I hope this letter is not too long and detailed, but it is not a simple subject to discuss. Also, I want it to convey my sincere belief that Monsanto has taken responsible action and is doing something about the problem.

Cordially,

Edward V. John
Public Relations Manager
Organic Chemicals Division

/stw

P. S. I just noticed the January 4 date on your letter and apologize for the delayed reply. Normally we try to be more prompt, but I just received it a few days ago.

EVJ

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