September 11, 1973

Mr. George Blacklock
H. S. Simons (International) Ltd.
425 Carral Street
Vancouver, British Columbia
Canada

Dear Mr. Blacklock::

Mr. Tom Oneson has informed me of the concern for PCB and the environment expressed by members of your CCPA Electrical Committee. We understand and appreciate this concern and are pleased that groups such as your Committee, which can be influential in offering advice on the proper use, handling and storage of PCBs, are interested in becoming more familiar with the overall situation.

I am sending under separate cover copies of pertinent literature which Mr. Oneson has recommended. I believe your Committee members will find this material very informative and helpful in understanding how PCBs relate to the environment and what steps must be taken to control their escape to the environment yet permit the use of PCBs as dielectric fluids which offer the desirable benefit of being fire resistant.

Several years ago, when increasing evidence indicated that PCBs were being identified in the environment and may be having some effect on some species of wildlife, Monsanto launched a program which we believe has significantly reduced the chances of PCBs escaping into the environment.

The program, which Monsanto voluntarily implemented worldwide, consisted of a planned termination of sales to those applications in which control of escape to the environment was impractical. We have now reached that point in the program in which the only sales being made are to closed system uses such as capacitors and transformers in electrical systems for which a commercially available fire-resistant alternative fluid is not available.

In conjunction with the restricted sales program we have kept our customers informed, by letters, bulletins, discussions and labels, of the need for extreme care which should be taken to prevent any PCBs from entering the environment through spills, leakage, use, disposal, vaporization or otherwise. We have also made available to our customers a used fluid disposal service which utilizes high temperature incineration for the complete destruction of PCBs.

You may ask "Why not discontinue the manufacture and sale of these products completely?". The answer is that in applications such as capacitors and transformers, the stability of the PCBs at high temperatures, and their fire-resistant properties, are vital in protecting public safety. At this time, there are no alternative materials available which possess the unique combination of properties in the PCBs. The electrical industry, Monsanto, and other chemical companies, have already spent significant time and effort in looking for alternatives which would not create environmental problems in case of accidental leakage. At this stage, these efforts have not been successful but the search will continue and I am confident that substitutes will be found in the future. In the meantime, we believe that our policy of restricting sales to vital closed systems, collecting and incinerating used fluids, and working with our customers to handle the product correctly to avoid spillage and discharge to the environment is in the best interest of the general public.

I hope you find this information informative and useful. If I can be of further service, please let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

cc: Mr. T. W. Oneson

bcc: P. G. Benignus
A. Erdman- 5090
C. Faton
D. Zaretsky - 5090