DRAFT

Dear Congressman Ryan:

Thank you for your letter of March 4, expressing further interest in actions we are taking to reduce possible escape of polychlorinated biphenyls to the environment.

I am pleased to be able to advise you that we have made excellent progress in implementing the programs referred to in my letter to you of June 30, 1970. In most cases we were able to complete our program well inside the target dates established, but we did encounter some minor problems in the reformulation area which resulted in some delays. Inspite of this, however, all planned actions were completed by the end of February 1971.

1) All sales of polychlorinated biphenyls to applications where the disposal of the end product cannot be controlled have been discontinued. This refers, of course, to the so-called wide range of plasticizer applications referred to in our bulletin O/PL-306.

2) Our complete range of fire-resistant hydraulic fluids has been reformulated to exclude the non-biodegradable polychlorinated biphenyls. Some 80% of this reformulation work was completed prior to the end of 1970 and the

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remainder, where particularly difficult technical problems were involved, was completed by the end of February 1971.

3) In the case of closed system applications; namely, transformers, capacitors, and heat transfer, we have made significant progress in closing the loop. Excellent cooperation from our customers has enabled us to establish collection, reclaiming, and disposal of spent fluids which should make a significant contribution towards avoiding escape to the environment. In addition, we have made good progress in developing an alternate fluid for use in capacitors and this product is currently undergoing customer trials. You will appreciate, I am sure, that the replacement of a fluid in a capacitor is an extremely complicated thing, and it is likely to be some months before results of long term testing are available to us.

The special high-temperature incinerator referred to in my last letter has now been purchased and is currently undergoing installation at our W. G. Krummrich Plant in

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Illinois. We anticipate that we will be in a position to start up the incinerator on June 1 of this year, but in the meantime we are continuing to collect and store spent fluids which will be incinerated as soon as we have the necessary capability.

Obviously, at this stage we have not been able to carry out trials in our own equipment but we did carry out bulk trials in a similar piece of equipment in the latter part of last year. The results were extremely good, with complete destruction of the polychlorinated biphenyls, avoiding any possibility of atmospheric emission.

Turning now to your suggestion that we should disclose details of our total production of polychlorinated biphenyls, I regret that I am unable to expand on the comments made in my letter to you of June 30, 1970. We consider such information extremely confidential, as disclosure could be of considerable value to our competitors. At the same time, we are anxious to help responsible government agencies in studying this problem and would be perfectly willing to release production figures to such an agency, providing they would guarantee confidentiality, and assure us that they would be used only for scientific purposes.

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Now that we have discontinued sales of polychlorinated biphenyls for end uses where disposal cannot be controlled, the question of labeling becomes far less important. Usage of these products is now restricted to closed systems and the public is unlikely to come into contact with such systems. As you know, we are labeling all material shipped from our plants warning that it is a possible environmental pollutant, and we are recommending how it should be handled. In addition, the electrical industry has made considerable progress in labeling its products which contain polychlorinated biphenyls, and it is my opinion that further action in this area would not have any significant value.

Installation of a special incinerator at our W. G. Krummrich Plant will certainly give us the capability to dispose of polychlorinated biphenyl wastes, both those generated in our plants, and those returned to us by customers as referred to previously. Polychlorinated biphenyl wastes which had previously been disposed of in landfills are unlikely to create any toxicity or environmental hazard in future years. There is, however, a small possibility that some of this material could find its way into underground water systems, but this would take place very slowly and would be unlikely

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to add significantly to levels currently being found. More important, I think, is the fact that we will not be utilizing such landfills in the future, thus preventing any future build up of possible contaminants.

I hope this letter brings you up to date with our current progress. I can assure you we are continuing to do everything possible to police both our own and our customers' operations to prevent future possibilities of the escape of polychlorinated biphenyls to the environment.

Very truly yours,

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