February 1, 1972

Dr. Griffith E. Quinby
P. O. Box 1313
Wenatchee, Washington 98801

Dear Dr. Quinby:

I regret and apologize for the delay in responding to comments in your letter to Dr. R. Emmet Kelly dated December 4, 1971 and your letter to me dated January 4, 1972.

I, too, am puzzled by Cornell University's interest in newsprint as a source of PCB into the food chain. I personally suspect the use of recycled paper in the production of some newsprint.

During the late 1940's and early 1950's, PCB's were selling for about 12 to 20 cents per pound. I have no personal knowledge of the cost of the active insecticides at that time; therefore, I cannot evaluate the relative economic benefits from the use of PCB's. In October, 1970, the Pesticide Regulation Division, then under the U.S. Department of Agriculture, issued PR-75 banning the use of PCB's in pesticides within six months. If the formulator who still had PCB's in stock, as of June, 1971, used them in his formulations after about April, 1971, he was producing an unregistered product. Since we did not supply PCB's for that use after August, 1970, I must assume he had stockpiled the material.

Our laboratory has analyzed samples of our Aroclor products and has found no detectable polychlorinated naphthalenes, polychlorinated dibenzofurans or polychlorinated dibenzodioxins.

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The sales data you received referred only to polychlorinated biphenyls. We have not assembled the information on the chlorinated terphenyls but we are certain that the quantities involved are considerably less. You may be interested in knowing that we are initiating a program of restricting the sales of chlorinated terphenyls and are now in the process of informing our customers of this change.

Referring to Monsanto's Technical Bulletin 306-A, you may reproduce Tables 1, 2 and 3. We would appreciate appropriate references relating to source of the information. I have not been able to establish the procedure used in the determination of the vapor pressure data. The information was developed many years ago and all personnel involved at that time are no longer with Monsanto.

Our discussion on the manufacture of polychlorinated biphenyls and the undesirable ingredients that would be formed was speculative since no information is available to me regarding the raw materials and process used by other producers. The use by Monsanto of a petroleum refinery-type tubular pyrolysis unit for the generation of biphenyl from benzene is well known. The design of the unit and the conditions of operation are considered privileged information which I cannot share with you. This unit, incidently, became fully operative in 1962.

In your letter dated January 20th to Dr. Warren C. Westgarth you refer to the use of polychlorinated terphenyls (PCT) in dielectric fluids for transformers and capacitors. I am not aware of this application and hope you can elaborate.

Sincerely,

W. B. Papageorge
Manager,
Environmental Protection

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cc: Dr. R. E. Kelly - A2SA