February 22, 1972

Mr. John H. Rich
President
Garden State Paper Company, Inc.
950 River Drive
Garfield, New Jersey 07026

Dear Mr. Rich:

I was informed by Monsanto's Mr. Phil Slayton of your interest in the industrial chemicals known as polychlorinated biphenyls (PCB's).

With the increasing evidence that polychlorinated biphenyls were being identified in the environment and may be having some effect on some species of wildlife, about two years ago Monsanto began a program which we believe will reduce significantly the chances of PCB's escaping into the environment.

Because the PCB problem is complex the program of voluntary withdrawal was executed in a stepwise fashion with those applications in which control of escape was practically impossible being the first to be discontinued.

We have now reached that stage in which sales of PCB's are severely restricted to closed dielectric applications for which a commercially available fire-resistant alternative fluid is not available.

We have carried out an extremely detailed research program aimed at developing alternatives to PCB's and also modifying the PCB's to improve their degree of biodegradation in waste treatment facilities. Our aim here is not to develop PCB's which can be allowed to escape into the environment but rather to produce it so that, in case of accidental spillage, it will be capable of being contained and degraded in waste treatment facilities.

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 PCB's at high temperatures and their fire-resistant properties are vital in protecting public safety. At this time there are no possess alternative materials available which pass the unique combination of properties in the PCB's. 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 fluid 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.

Considerable comment has been made, particularly in the popular press, that PCB's are "highly poisonous", "an imminent hazard", "cause birth defects", "carcinogenic". None of these statements have been substantiated. Incidents of human toxicity have been associated with situations involving extremely high exposure levels due to improper industrial hygiene practices or accidental ingestion of highly contaminated food.

I have enclosed copies of articles relating to PCB's.

I hope this information is useful to you and if I can be of further service please let me know.

Sincerely,

W. B. Papageorge
Manager
Environmental Protection

WBP/bt

cc: P. L. Slayton - New York

bcc: L. T. Johnson - New York
B. G. Tibbetts - B2SE

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