bcc: D. R. Bishop
F. J. Fitzgerald
R. C. Potter
(no attachment)

Monsanto

SPECIALTY CHEMICALS DIVISION

EARLE H. HARBISON, JR.
General Manager

MONSANTO INDUSTRIAL CHEMICALS CO.
800 N. Lindbergh Boulevard
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Phone: (314) 694-3008

June 8, 1976

Mrs. Hillis L. Howie
Route 6 Box 85
Bloomington, Indiana 47401

Dear Mrs. Howie:

Mr. Hanley has asked me to respond to your thoughtful letter of May 22 since I am the General Manager of the Specialty Chemicals Division of Monsanto and therefore directly responsible for the manufacture and sale of Polychlorinated Biphenyl products (PCB's). Monsanto feels very keenly about the toxicological and environmental impact of the products we manufacture and I would like to give you two examples of that concerning the very product under consideration here.

Prior to 1970, Monsanto manufactured and distributed PCB's for a wide variety of uses in the United States including carbonless carbon paper, hydraulic fluids, plasticizers, etc. In 1970, when the first scientific investigations confirmed the continuing presence of PCB's in the environment, and long before information regarding the potential impact was determined, Monsanto unilaterally and voluntarily began its program of terminating sales of PCB's to all applications other than those of the electrical industry where we believed losses to the environment were minimal.

The reasons we continued marketing to even the electrical industry were: first, the PCB fluids we manufactured had characteristics, including high fire resistance that could not be duplicated by other products; and, second, these fluids were used in so-called closed or sealed systems. The import of that latter remark being that they would not escape into the environment. I might add parenthetically that even today, as we are phasing out of the manufacture of PCB's for electrical industry uses, there is no replacement fluid possessing comparable fire resistant characteristics.

A second step which we took, again when we understood the nature of the problem, was to literally build a "concrete bathtub" around our PCB

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manufacturing facility in order to restrict losses to the environment to the absolute minimum.

There are many ~~other~~ factors connected with the history of PCB manufacture and our handling of it and I am attaching a statement which we have prepared to outline the problem which we have faced. Monsanto is currently in the process of phasing out of all manufacture and distribution of PCB's. ~~We~~ have gone on public record as stating that we not only want to but are going to discontinue this business as quickly as the electrical industry can convert to ~~environmentally safe and acceptable~~ alternate dielectric ~~fluids~~.

We have made available to our customers, all of whom we believe to be competent, technically sound and responsible companies, the information we have on the protection of manufacturing facilities and even offer our own incineration facilities at our plant outside of St. Louis to help them dispose of waste should they not have another appropriate facility. However, we do not, nor do we feel we can, "police" the specific handling of our end product by each customer.

Your mention of the Toxic Substances legislation is another timely issue. The Manufacturing Chemists' Association, comprised of the major chemical companies and of which Monsanto is a principal member, has been instrumental in working with key members of Congress to develop a practical, yet effective, version of Toxic Substances legislation and we believe a suitable Bill will shortly be sent to the full Congress for its consideration. We believe this type of joint government-industry emphasis on controlling potential pollutants will help, over the long term, to prevent the most distressing type of problem which your community is currently facing.

I hope you find my letter to be responsive to your question. If I can be of further assistance to you, please let me know.

Sincerely,

/rd

attach.