

bcc: H. S. Bergen - B2SL
C. P. Cunningham - B2SA
W. B. Papageorge - B2NK

March 3, 1972

Mr. Paul DeFalco, Jr.
Regional Administrator
U.S. Environmental Protection Agency
Region IX
100 California Street
San Francisco, California 94111

Dear Mr. DeFalco:

I have been asked to respond to your letter addressed to Mr. E. J. Beck, asking for certain information regarding sales of polychlorinated biphenyls by Monsanto and Central Solvents and Chemicals in the Los Angeles County area. I know that you have discussed this by telephone with Mr. W. B. Papageorge and I have reviewed the situation with him.

It has always been Monsanto's policy not to divulge the names of our customers for the products we make, nor the quantities of products these customers purchase. We consider this to be proprietary information and therefore hold it confidential. Consequently we do not feel free to comply with your request for data on customer names and quantities purchased.

On the other hand, last November we did release to governmental agencies, including the EPA, Monsanto's total production and sales figures on PCB's for the years 1960 through 1971. These statistics have been released publicly and earlier this year we discussed them in detail with members of the scientific

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community and with representatives of the Washington multi-agency PCB task force of which EPA is a member. For your ready reference I am enclosing a copy of this information.

We certainly share your concern and desire to control the discharge of PCB's into the environment. It is because of this concern that we implemented a program of self-imposed curtailment of sales of these products so that now we are only offering continuing supplies for closed system dielectric applications where the potential danger of environmental contamination is carefully controlled.

Furthermore, as another step in safeguarding the environment we have informed all customers of PCB materials of the potential dangers should these materials escape and have strongly urged them to take every precaution to prevent losses through spills, usage, leakage, disposal, vaporization or otherwise.

I regret we cannot comply with your request for customer information but if we can be of assistance to you in other ways we will be glad to visit you or your designees to discuss the PCB situation further.

Sincerely,

W. R. Corey, Director
Functional Product Groups

/jfe

Enclosure

cc: Mr. Charles H. Sommer/Monsanto

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NEWS

Monsanto

FOR RELEASE
IMMEDIATELY 1971

MONSANTO INDUSTRIAL CHEMICALS COMPANY

E. V. John
PUBLIC RELATIONS DEPARTMENT
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166
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MONSANTO RELEASES PCB PRODUCTION FIGURES TO DEPARTMENT OF COMMERCE

WASHINGTON, D.C., Nov. 30 -- Monsanto Company announced today it has released figures to the United States Department of Commerce showing the company's U.S. production and sales of polychlorinated biphenyl (PCB) from 1960 through estimated 1971.

Closed-system electrical uses ranged from 11,000 tons per year to 20,000 tons per year during the period.

The report also shows Monsanto voluntarily reduced its nonelectrical sales of PCB from the high of 16,000 tons in 1970 to 4,400 tons in 1971. Substantial further reduction will be accomplished in 1972, the company said.

C. P. Cunningham, managing director of Monsanto Industrial Chemicals Co., an operating unit of Monsanto, said, "As part of our control program, the data were originally prepared for the Federal PCB Joint Task Force and other concerned scientists for use on a confidential basis so scientists can properly evaluate the figures and relate them as to impact on the environment."

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--2 MONSANTO: RELEASES PCB PRODUCTION FIGURES xxx environment."

Monsanto has now chosen to release the figures publicly "because scientists have continued to express a need for the data to make a proper estimate of how much PCB might be in the environment. We also believe the figures will inform the public about Monsanto's positive actions to limit the sale of PCB to confined applications," the company executive said.

"Now that the figures are public information," Cunningham added, "we are confident both the scientific community and the public press will interpret the data properly. These are production and sales figures only. It should be clearly understood that all this material is not in the environment.

"For example," Cunningham said, "over 60 per cent of all sales in the past 12 years have been for closed-system electrical uses. It would be a completely false and irresponsible conclusion to say all PCB produced is in the environment. Much of the material is still contained in sealed electrical equipment where it acts as a fire-resistant safety fluid, protecting human lives and property from the danger of fire and explosion."

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--3 MONSANTO: RELEASES PCB PRODUCTION FIGURES xxx explosion."

Cunningham concluded, "Monsanto continues its program to control the uses and prevent the release of PCB into the environment. To date, we have cut off all sales to paints, plasticizers, sealants, adhesives and all other open-system uses. We are receiving used PCB from customers for regeneration or safe disposal. And we are engaged in an all-out research effort to develop less persistent forms of PCB or suitable products which retain the fire safety features of PCB. We call on other producers, worldwide, to join in this effort."

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NOTE TO EDITORS: PCB production and sales figures attached.

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PRODUCTION AND SALES
POLYCHLORINATED BIPHENYLS (PCB)
MONSANTO INDUSTRIAL CHEMICALS COMPANY
(SHORT TONS)

<u>YEAR</u>	<u>U.S. PRODUCTION</u>	<u>DOMESTIC SALES</u>		<u>U.S. EXPORT SALES</u>
		<u>Electrical* Insulating Liquids Uses</u>	<u>All** Other Uses</u>	<u>All Uses</u>
1971 (Est)	20236	14417	4401	4938
1970	42527	20268	16263	6826
1969	38194	18564	15034	5312
1968	41427	20568	11990	5616
1967	37655	20387	10846	4062
1966	32925	18897	10642	3426
1965	30240	16203	9695	2117
1964	25417	13769	8666	2048
1963	22367	11448	7618	1824
1962	20986	11683	7339	1809
1961	20333	11108	7661	2076
1960	20786	12444	5163	1827

* Closed Systems - Transformers and Capacitors

** Including Heat-transfer Systems, Hydraulics/Lubricants, Plasticizers

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PCB MANUFACTURE AND SALES
MONSANTO INDUSTRIAL CHEMICALS COMPANY
1957 Thru 1964
(Thousands of Pounds)

	<u>1957</u>	<u>1958</u>	<u>1959</u>	<u>1960</u>	<u>1961</u>	<u>1962</u>	<u>1963</u>	<u>1964</u>
U.S. PRODUCTION	(1)	(1)	(1)	37919	36515	38353	44734	50833
DOMESTIC SALES (LBS.)	32299	26061	31310	35214	37538	38043	38132	44869
U.S. EXPORT SALES	(2)	(2)	(2)	(2)	(2)	(2)	3647	4096

DOMESTIC SALES BY CATEGORY

Heat Transfer	-	-	-	-	-	157	582	929
Hydraulics/Lubricants	1612	1549	2685	2523	4110	3915	3945	4374
Misc. Industrial	704	755	1569	1559	2114	1681	1528	1692
Transformer	12955	5719	5984	7921	6281	7984	7290	7997
Capacitor	17028	14099	16499	16967	15935	15382	15606	19540
Plasticizer Applications	(1)	3939	4573	6244	9098	8924	9181	10337
Petroleum Additives	-	-	-	-	-	-	-	-

DOMESTIC SALES BY PCB GRADE

Aroclor 1221	23	16	254	103	94	140	361	596
Aroclor 1232	196	113	240	155	241	224	13	13
Aroclor 1242	18222	10444	13598	18196	19827	20654	18510	23571
Aroclor 1248	1779	2559	3384	2827	4023	3463	5013	5238
Aroclor 1254	4461	6691	6754	6088	6294	6325	5911	6280
Aroclor 1260	7587	5982	6619	7330	6540	6595	7626	8535
Aroclor 1262	31	184	359	326	361	432	414	446
Aroclor 1268	-	72	102	189	158	210	284	190
Aroclor 1016	-	-	-	-	-	-	-	-

- (1) Production figures and Plasticizer Applications figures unavailable during year indicated.
(2) U.S. Export Sales figures unavailable during year indicated.

PCB MANUFACTURE AND SALES
MONSANTO INDUSTRIAL CHEMICALS COMPANY
1965 Thru 1971 + 1972 Estimate
(Thousands of Pounds)

	<u>1965</u>	<u>1966</u>	<u>1967</u>	<u>1968</u>	<u>1969</u>	<u>1970</u>	<u>1971</u>	<u>Est. 1972</u>
U.S. PRODUCTION	60480	65849	75309	82854	76387	85054	34994	
DOMESTIC SALES (LBS.)	51796	59078	62466	65116	67194	73061	34301	
U.S. EXPORT SALES	4234	6852	8124	11231	10624	13651		
<u>DOMESTIC SALES BY CATEGORY</u>								
Heat Transfer	1237	1766	2262	2529	3050	3958	3060	0
Hydraulics/Lubricants	4616	4258	4643	5765	8039	7403	1552	0
Misc. Industrial	1841	1779	1426	1283	1079	1627	1155	0
Transformer	8657	8910	11071	11585	12105	13828	11134	(25000 to 30000
Capacitor	23749	28884	29703	29550	25022	26708	14141	(total dielectric
Plasticizer Applications	11696	13481	13361	14404	16460	19537	3259	0
Petroleum Additives	-	-	-	-	1439	-	-	0
<u>DOMESTIC SALES BY PCB GRADE</u>								
Aroclor 1221	369	528	442	136	507	1476	2215	300
Aroclor 1232	7	16	25	90	273	260	171	300
Aroclor 1242	31533	39557	43055	44853	45491	48588	21981	4000
Aroclor 1248	5565	5015	4704	4894	5650	4073	213	0
Aroclor 1254	7737	7035	6696	8891	9822	12421	4661	6000
Aroclor 1260	5831	5875	6417	5252	4439	4890	1725	600
Aroclor 1262	558	768	840	720	712	1023	1	0
Aroclor 1268	196	284	287	280	300	330	-	0
Aroclor 1016	-	-	-	-	-	-	3334	17000

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AROCLOR APPLICATIONS

CURRENT USES

Electrical Capacitors: Aroclor 1016*, the major product used; Aroclor 1221; Aroclor 1254; very limited usage.

Electrical Transformers: Aroclor 1242; Aroclor 1254; Aroclor 1260.

* Similar to Aroclor 1242 with 5 chlorine and higher isomers removed.

FORMER USES

Electrical Capacitors: Aroclor 1242; Aroclor 1254.

Electrical Transformers: Aroclor 1242; Aroclor 1254; Aroclor 1260.

Heat Transfer Systems: Aroclor 1242; Aroclor 1248; Aroclor 1254.

Vacuum Pumps: Aroclor 1248; Aroclor 1254.

Gas Transmission Turbines: Aroclor 1232; Aroclor 1242.

Hydraulic Fluids: Aroclor 1232; Aroclor 1242; Aroclor 1248; Aroclor 1254; Aroclor 1260.

Plasticizers in Synthetic Resins: Aroclor 1248; Aroclor 1254; Aroclor 1260; Aroclor 1262; Aroclor 1268.

In Adhesives: Aroclor 1221; Aroclor 1232; Aroclor 1242; Aroclor 1248; Aroclor 1254.

In Surface Coatings: Aroclor 1221; Aroclor 1248; Aroclor 1254; Aroclor 1260; Aroclor 1262.

AROCLOR APPLICATIONS

FORMER USES Continued

Plasticizer in Rubbers: Aroclor 1221; Aroclor 1232;
Aroclor 1242; Aroclor 1248; Aroclor 1254; Aroclor 1260.

Wax Extenders: Aroclor 1242; Aroclor 1254; Aroclor 1268.

Dedusting Agents: Aroclor 1254; Aroclor 1260.

: Pesticide Extenders: Aroclor 1254.

Lubricants, Cutting Oils: Aroclor 1254.

Carbonless Reproducing Paper: Aroclor 1242.

Inks: Aroclor 1254.