

Hon. William F. Ryan
House of Representatives
Washington, D.C.

My dear Congressman Ryan:

Let me extend my sincere thanks to you for meeting last week with our regional vice president, Mr. Sam Pickard, and assistant general manager for the Organic division, Mr. John Mason. I hope they were able to convey to you Monsanto Company's deep concern about the environment and the responsible actions we have taken toward pollution abatement.

I can assure you that our commitment to pollution abatement has not been generated by recent public interest in this subject. Our record shows we have always attempted to be a good neighbor in communities where we operate manufacturing facilities. We implemented positive pollution control programs long before the word ecology became fashionable.

In view of our activity in total pollution control programs and the special measures we have taken to regulate PCB, we feel any accusation or implication of irresponsible action by Monsanto is unjustified.

We have been investigating the relationship of PCB to the environment since 1968. We have contacted scientists and agencies around the world. Most recently, we attended a U.S. Department of the Interior meeting where some 40 scientists

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from throughout the country gathered to exchange information on PCB and recommend actions. When we first became aware of the possible threat to the environment by PCB, our immediate action was to cooperate fully with scientists and government agencies to properly identify and measure PCB in the environment. Since then, we have taken other major steps to strictly monitor the manufacture, use and disposal of PCB-containing products which could possibly build up in the ecological system.

In your meeting with Messrs. Pickard and Mason, they discussed with you the very important distinction between various Aroclor products and the fact that not all Aroclors are PCB.

Scientific evidence has been available for some time which shows only the higher chlorinated hydrocarbons -- those containing more than 54 per cent chlorine or higher -- are being found in the environment. They appear to be presenting a possible threat to certain species of birds and fish.

Monsanto manufactures some of these higher chlorinated products. (Worldwide there are several other manufacturers.) As Messrs. Pickard and Mason explained to you, it is totally inaccurate to say that all Aroclor products are a threat to man and animal life. Monsanto produces several products under the trade name Aroclor which are not polychlorinated biphenyls and which pose no threat to the environment.

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Our representatives also explained to you that toxicity warnings used in labeling chemical compounds cannot be directly related to public health. There are many chemicals which require special handling in various manufacturing stages. When these chemicals are used in other products, they are often used in minute amounts and become an integral part of that product, therefore, presenting no threat to the public.

In my opinion, to release a complete list of uses for Aroclor, names of products and manufacturers, as you suggest, would be an irresponsible action and only cause undue alarm to the public.

We have repeatedly stressed the major markets for PCB-containing products are in electrical applications, where the fluid is sealed into an electrical component and in closed system heat-transfer uses. I am enclosing our current bulletins describing these uses.

At one time, we did suggest many uses for this material. To our knowledge, PCB has never been used in all these applications. We do know of our products being used in some specialty applications. They are as follows:

Specialty coatings such as primer paints, lacquers and sealants; adhesives; epoxy resins; special synthetic and natural rubber products for wire and cable coatings, joint-sealers and protective coatings; and paper and textile coatings and printing inks.

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Only a few days ago, it came to our attention that PCB was being used as an inert carrier by two small insecticide blenders. We have notified our distributors not to sell our products for this use. We have also requested the U.S. Department of Agriculture to refuse to register any insecticide formulation showing PCB as a component.

In a related action, we have alerted our customers to the possible environmental problem and are assisting them in switching from PCB-containing compounds to other Monsanto products in applications where we believe the chemical could be a threat to the environment.

With regard to our manufacturing operations, we have stated clearly our total commitment to pollution abatement. Production of polychlorinated biphenyls came under even stricter scrutiny when it appeared as a possible environmental hazard. We have improved production techniques and are continually upgrading pollution abatement devices in our plants. In the very near future, all our PCB-containing products will carry a new shipping label stressing the possible environmental hazard.

Finally, Congressman Ryan, I am sure you are aware that Monsanto's production and sales figures are confidential information, as they are in most companies. We are ready to

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cooperate fully with you, or any government agency, when we receive assurance these figures will be kept confidential.

I hope you will consider this letter a responsive reply to your questions. In my opinion, Monsanto Company has taken a responsible position and corrective action in dealing with the PCB situation.

Sincerely,

E. J. Bock