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April 28, 1970

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

Dear Congressman Ryan:

Mr. Bock has asked me to respond to your letter of April 9 concerning PCB's. Please accept my sincere apoligies for the delay in responding.

Mr. Sam Pickard and myself are extremely grateful for the opportunity of meeting with you to discuss this matter and I hope that we were able to convey to you Monsanto Company's deep concern about the environment and responsible actions we are taking towards 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 conduct our operations in a manner consistent with the best interest of the public. 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 and are continuing to take to regulate PCB, we feel any accusation or implication of irresponsible action by Monsanto is unjustified.

As you know, only recently tremendous strides in science and technology have perfected analytical techniques which make it possible to detect and measure extremely minute quantities of an item in other substances. Our own scientists have made a significant contribution in these developments and we are constantly working to utilize these techniques to further the degree of control exercised by our plants and those of our customers. Monsanto Company fully recognizes its responsibility and will continue to develop and produce products which contribute to the public well being, but at the same time we

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will take every precaution to protect the environment in which we all live.

We have been investigating the relationship of PCB to the environment since 1968. We can only assume that the other manufacturers of PCB materials are doing likewise. 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 from throughout the country gathered to exchange information on PCB's and recommend actions. On April 29, we are participating in a meeting of the Office of Science and Technology of the Executive Office of the President to discuss the toxicity of PCB's. 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 directed toward strictly monitoring the manufacture, use and disposal of PCB-containing products which could possibly build up in the ecological system.

It should be emphasized that the apparent PCB problem relates only to the possible effects on some species of birds. Manufacturing and use experience for thirty years, earlier animal toxicity studies, and the interim reports on current extensive toxicological studies with various species of animals indicate that there is no threat to the public health.

You will recall that during our meeting with you we discussed the very important distinction between various Aroclor® products and the fact that not all Aroclors® are PCB's. Scientific evidence indicates that only the higher chlorinated biphenyls--those containing more than 54 percent chlorine--are being found in the environment. These materials appear to be presenting a possible threat to certain species of birds. As we also discussed, Monsanto manufactures several products under the trade name Aroclor® which are not polychlorinated biphenyls and which pose no threat to the environment.

References to the toxicity of the Aroclors® made in your press release were of course extracted from our safety instructions directed towards the protection of the health and safety of workers using large quantities of these materials in industrial processes, often at elevated temperatures. As you will appreciate, there are many chemicals which require careful handling during processing operations, and such instructions and definitions of possible hazards are standard practice in the chemical and allied industries. When used in other products the Aroclors® are usually present in only very small quantities or when used

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alone they are normally in closed systems and consequently represent no hazard to human health. It is therefore incorrect to assume that the PCB's presently being found in the environment in parts per billion or parts per million represent a health hazard to the public.

In my opinion, to release a complete list of uses for Aroclor®, names of products and manufacturers, as you suggest, would only cause undue alarm to the public and would make no contributions in this area.

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 usages. In the early stages of market development for the Aroclors®, we recommended many usages for these products based on their chemical properties. Not all of these proposed applications proved satisfactory, however. In addition, we have become much more selective in recommending usages for these products bearing in mind the additional information now available to us due to the recent developments in analytical techniques and technology.

Recently it came to our attention that PCB was being used as an inert carrier by two small insecticide formulators. We have notified our distributors to discontinue all sales of our products for this usage and we have also requested the U. S. Department of Agriculture to refuse to register any insecticide formulation containing PCB as a component.

In a related action, we have already 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 that 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 of 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 cooperate fully

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with you or any responsible government agency when we receive assurance that these figures will be kept confidential.

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

Sincerely,

John Mason
Assistant General Manager

JM/gd

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