

**MONSANTO POSITION STATEMENT FOR DISPOSAL
OF PCB's BY INCINERATION**

Monsanto Company is a broad-based chemical manufacturing company. From 1935 until 1977, Monsanto Company was the major manufacturer of polychlorinated biphenyl (PCB) compounds in the U.S. and consequently has broad experience and expertise in handling and disposing of these chemicals.

The environmental and health effects and disposal of PCB's has been the subject of hundreds of technical and media articles. Recognized, technically trained, competent scientists and medical experts have published thousands of pages of documents discussing the health and environmental effects of these compounds and there is still disagreement among them as to the actual effects of PCB's on man and the environment. The scare labels of the media headlines of the early to mid-1970's of "deadly toxins" and "human carcinogens" are being rebutted and disproved by more thorough, detailed human epidemiology and animal studies.

In the report of the National Academy of Sciences Committee on the Assessment of Polychlorinated Biphenyls in the Environment (Fall, 1979) the committee stated the following:

"An analysis of PCB data compiled following the criteria of FIFRA and TSCA proposed guidelines, leads to the conclusion that PCB's are persistent and are likely to accumulate. PCB's do not appear particularly toxic for short-term exposure, but results are subject to interpretation."

This paper, however, is directed not toward toxicity but rather the proper disposal of PCB's. Safe and acceptable technology for destruction of PCB's by high-temperature incineration has been known and practiced by the scientific and industrial world since PCB's were first discovered to be environmentally persistent in the early 1970's.

Many European hazardous waste disposal facilities include high-temperature incineration equipment to routinely handle both solid and liquid forms of chemical wastes, such as PCB's and other chlorinated wastes. These include sludges, contaminated earth and other debris. At least a dozen such facilities are currently in operation and have been functioning satisfactorily for several years. Many of these facilities are jointly owned and operated by both the government and private sector. All of these facilities are capable of destroying PCB's in an environmentally acceptable manner with no human health hazard.

In both the U.S. and Canada successful test burns of various high-temperature incinerators have been performed that have been carefully monitored by appropriate State and Federal regulatory agencies. This

includes the Rollins Environmental Services facility at Deer Park, Texas, and ENSCO at El Dorado, Arkansas. Both of these facilities meet the rigid specifications, including destruction efficiencies prescribed by Federal regulations under the Toxic Substances Control Act (40 CFR 761), and have been approved by the EPA for incineration of PCB's.

Based upon the results of these tests, EPA scientists and officials and other interested parties have concluded that the two U.S. incinerators are capable of destroying PCB's without harming human health or the environment.

The major obstacle to safe and ultimate disposal of PCB's is not safe technology, but public awareness and education so that suitable disposal sites can be located in industrial areas without unfounded public fear and opposition. Many citizens activists groups share this concern. Attached is information published by one of these informed groups, the Great Lakes Basin Commission, which speaks to the PCB problem generally and, specifically, to incineration and public fear of PCB's and their disposal options.

I urge you to carefully consider all of the facts in an unemotional arena in discussing PCB waste disposal options. Certainly, regulated, controlled disposal facilities using proven technology, such as high-temperature incineration, is preferable to long-term storage at many private industrial locations. The potential dangers of environmental contamination due to long-term storage and handling (e.g., repackaging leaking or damaged containers, decontamination of storage facilities and equipment, etc.) are significantly greater than once-and-for-all ultimate destruction of PCB's by safe and acceptable incineration.

enclosure

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