bcc: C. H. Sommer
C. P. Cunningham
W. R. Corey

September 27, 1972

Ms. Diane M. Johnson
702-B Hamlin
Oakland University
Rochester, Michigan 48063

Dear Ms. Johnson:

Your letter dated September 19 and addressed to Mr. Edward J. Bock had been forwarded to me for response since I have been intimately involved in the study of polychlorinated biphenyls (PCBs) and their impact on the environment.

We appreciate your concern for the environment and concur with your belief that the use of PCBs should be restricted. In fact, several years ago, when increasing evidence indicated that PCBs were being identified in the environment and may be having some effect on some species of wildlife, Monsanto launched a program which we believe has significantly reduced the chances of PCBs escaping into the environment.

The program, which Monsanto voluntarily implemented worldwide, consisted of a planned termination of sales to those applications in which control of escape to the environment was impractical. We have now reached that point in the program in which the only sales being made are to closed system uses such as capacitors and transformers in electrical systems for which a commercially available fire-resistant alternative fluid is not available.

In conjunction with the restricted sales program we have kept our customers informed, by letters, bulletins, discussions and labels, of the need for extreme care which should be taken to prevent any PCBs from entering the environment through spills, leakage, use, disposal, vaporization or otherwise. We have also made available to our customers a used fluid disposal service which utilizes high temperature incineration for the complete destruction of PCBs.

You may ask "Why not discontinue the manufacture and sale of these products completely?" The answer is that in applications such as capacitors and transformers the stability of the PCBs at high temperatures and their fire-resistant properties are vital in protecting public safety. At this time there are no alternative materials available which posses the unique combination of properties in the PCBs. The electrical industry, Monsanto, and other chemical companies have already spent significant time and effort in looking for alternatives which would not create environmental problems in case of accidental leakage. At this stage these efforts have not been successful but the search will continue and I am confident that substitutes will be found in the future. In the meantime, we believe that our policy of restricting sales to vital closed systems, collecting and incinerating used fluids and working with our customers to handle the product correctly to avoid spillage and discharge to the environment is in the best interest of the general public.

You refer in your letter to the elimination of the use of PCBs in Japan and the United Kingdom. It is my understanding that PCBs have not been totally banned in Japan but have been placed under severe restrictions with some critical uses still being permitted. For example, the Government's electrically operated railway system will continue to use transformers containing PCBs because of important safety considerations. In the United Kingdom Monsanto is the sole supplier of PCBs and the program we have in that country is identical to the U.S. program.

I have enclosed a copy of a report entitled Polychlorinated Biphenyls and the Environment issued in May by the Federal Interdepartmental Task Force on PCBs. In my opinion this report is the best summary of the PCB activities worldwide. You will note that excellent cooperation between industry, government and the scientific community has resulted in a control program which dramatically reduces the amount of PCBs which enter the environment but provides for the continued use of PCBs in closed systems in which fire and explosion resistance are critical.

I hope you find this information informative and useful. If I can be of further service please let me know.

Sincerely,

W. B. Papageorge
Manager
Environmental Protection

WBP/bt