bcc: H.S.Bergen
J.R.Eck
E.V.John
R.E.Kelly/E.P.Wheeler
H.L.Minckler
W.B.Papageorge
P.S.Park
S.Pickard-WASHINGTON

March 24, 1971

Hon. William F. Ryan
House of Representatives
Washington, D.C. 20515

Dear Congressman Ryan:

Thank you for your letter of March 4, which was acknowledged by my secretary during my absence from the office last week.

I am pleased to be able to advise you that we have made excellent progress in implementing the programs referred to in my letter of June 30, 1970. In most cases we were able to complete our program well inside the target dates established, but we did encounter some minor problems in the reformulation area which resulted in brief delays. Inspite of this, however, all planned actions were completed by the end of February 1971.

1) All sales of polychlorinated biphenyls to applications where the disposal of the end product cannot be controlled have been discontinued. This refers, of course, to the so-called wide range of plasticizer applications listed in our bulletin O/PL-306.

2) Our complete range of fire-resistant hydraulic fluids has been reformulaced to exclude polychlorinated biphenyl. Some 80% of this reformulation work was completed prior to the end of 1970 and the remainder, where particularly difficult technical problems were involved, was completed by the end of February 1971.

DSW 334093

STLCOPCB4080670

3) In the case of closed system applications; namely, transformers, capacitors, and heat transfer systems, we have made significant progress in closing the loop. Excellent cooperation from our customers has enabled us to establish collection, reclaiming, and disposal of spent fluids which should make a significant contribution towards avoiding escape to the environment.

In addition, we have made good progress in developing a more environmentally acceptable polychlorinated biphenyl fluid for use in capacitors and this product is currently undergoing customer trials. You will appreciate, I am sure, that replacement of the fluid in capacitor manufacture is extremely complicated technically and it is likely to be some months before results of long term testing are available to us.

To date we have not been able to develop an acceptable replacement for transformer applications where the combination of dielectric properties and fire resistance is extremely critical. In this area we have concentrated our efforts on closing the loop as referred to above.

The special high-temperature incinerator referred to in my last letter has been purchased and is now being installed. We anticipate we will be in a position to start up this incinerator on July 1 of this year, but in the meantime we are continuing to collect and store spent fluids which will be incinerated as soon as we have the necessary capability.

Obviously, at this stage we have not been able to carry out trials in our own equipment but we did carry out bulk trials in a similar piece of equipment in the latter part of last year. The results were extremely good, with the polychlorinated biphenyl being completely destroyed, thus avoiding any possibility of atmospheric pollution.

Turning now to your suggestion that we should disclose details of our total production of polychlorinated biphenyls,

I regret that I am unable to expand on the comments made in my letter to you of June 30, 1970. We consider such information extremely confidential, as disclosure could be of considerable value to our competitors. At the same time, we are anxious to help responsible government agencies in studying this problem and we would be perfectly willing to release production figures to such an agency, providing they would guarantee confidentiality, and assure us that the information would be used only for scientific purposes.

Now that we have discontinued sales of polychlorinated biphenyls for end uses where disposal cannot be controlled, the question of labeling becomes far less important. Usage of these products is now restricted to closed system applications and the public is unlikely to come into contact with such systems. As you know, we are labeling all materials shipped from our plants warning that it is a possible environmental pollutant, and we are recommending how it should be handled. In addition, the electrical industry has made considerable progress in labeling its products which contain polychlorinated biphenyls and it is my opinion that further action in this area would not have any significant value.

Installation of the high-temperature incinerator will certainly give us capacity to dispose of polychlorinated biphenyl wastes, both those generated in our own plants, and those returned to us by customers as referred to previously. Polychlorinated biphenyl wastes which have previously been disposed of in landfills are unlikely to create environmental hazards in future years. Much more important I think is the fact that we now have the capability to incinerate such waste materials, which will enable us to minimize escape to the environment in future years.

I hope this letter brings you up to date with our current progress. I can assure you that we are continuing to do everything possible to police our own

STLCOPCB4080672

and our customers' operations to prevent future possibilities of the escape of polychlorinated biphenyls to the environment.

Yours sincerely,

John Mason
Assistant General Manager
Organic Chemicals Division

/jf

DSW 334096