June 19, 1973

Ron Regusa
H. A. Gogarty, Inc.
2424 International Trade
Mart Building
New Orleans, Louisiana 70130

Subject: Polychlorinated Biphenyls (PCB)

Dear Mr. Regusa:

Your concern for the significance of the precautionary statements you noted on shipping documents and labels relating to materials containing polychlorinated biphenyls is understandable and appreciated. The purpose of this precautionary statement does require explanation to thoughtful workers and supervisors.

Recently, we have added to our precautionary statement for two purposes only. The first is to inform everyone involved that these materials, if allowed to escape into the environment, are considered pollutants and could accumulate to levels which may affect some species of marine or wildlife. The second purpose is to emphasize the need to prevent these materials from contacting any item intended for human or animal consumption. Like many other products, ingestion could cause problems and it is not intended that they be taken internally or be used in foods, and their presence could contaminate food or feed items and result in confiscation or condemnation of such items to avoid human or animal health problems.

Concerning the possible personal health hazards to workers who handle these materials, our experience indicates that these materials are not serious health hazards. If inhaled, they may cause irritation of the nose and throat, and on the skin they can cause mild irritation. Therefore, it is obviously recommended that inhalation of fumes and contact with the skin be kept to a minimum.

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It is also appropriate to recall, however, that these materials have been involved in commerce for over forty years and we are unaware of any reported occurrences resulting in harm to individuals or other cargo during shipment. There is no reason to believe that with proper handling this excellent record cannot continue. We are hopeful that our precautionary statement will encourage proper use and handling and thereby avoid human and environmental problems.

I hope my comments are helpful. If I can be of further service, please let me know.

Sincerely,

W. A. Stewart
Manager Operations & System Control

WAS/lk