

D. Wood - St. Louis

July 3, 1974

PCB INDIA

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Thank you for sending us a copy of the March 14 letter signed by Mr. Marcharan Singh of the Indian Standards Institute and the accompanying annexure summarizing current thinking in India on PCBs. The attached memo from Bill Papageorge and enclosures will, we believe, be helpful to you in clarifying some of the comments made in the ISI letter which suggests there may have been some misinterpretations arising from the large volume of data which the ISI has summarized.

In the first paragraph of the March 14th letter reference is made to "Aroclor" which as Bill states implies that Monsanto's material is the only PCB currently in commercial usage in India. Since we are aware that both Bayer "Germany" and Prodelec "France" supply PCB-based dielectric fluids in the Indian market, we feel that it might be more objective to refrain from the use of particular corporate trademarks in such communications. We hope that you will be able to discreetly turn the thinking of the ISI away from the use of particular company trademarks.

I would like to amplify Bill's comments on Therminol. Monsanto, in the past, marketed the Therminol FR range of heat transfer fluids which were based on the PCBs. Recognizing that this particular application could potentially lead to an escape to the environment, we withdrew the Therminol FR range of heat transfer fluids. We continue to market heat transfer fluids under the trademark, Therminol, which are not PCB-based. We expect there to be a significant potential for our non-PCB Therminols in India. In view of our continued use of the Therminol trademark covering non-PCB transfer fluids, it is important that you try and have reference to Therminol removed from PCB documentation.

I should like to re-emphasize comments made by Bill regarding Section 3, Applications. Monsanto policy, as Bill states, restricts the sale of polychlorinated biphenyls to the dielectric applications in transformers and capacitors and goes beyond even the recommendations made by the member nations

of OECD. We continue to support the use of PCB in the dielectric area.

In commenting on Mr. Singh's letter, I have followed his terminology of referring to PCB. This does not perhaps truly reflect our attitude. The persistence of these compounds in the environment is related to the level of chlorination. You are aware that our Aroclor 1016 capacitor fluid is a lower chlorinated biphenyl and higher chlorinated isomer content is closely limited and controlled. International specifications established by CIGRE reflect this differential between low and high chlorinated biphenyls and we believe that you should bring to the attention of the ISI the existence of international specifications which objectively avoid the all encompassing term polychlorinated biphenyl and reflect the differences in chlorination content.

We hope that our comments and the attached data will be helpful. Please advise us if we can be of further help in their deliberations.

D. Wood

Attachments:

WBP memo of June 4, 1974

"Chlorinated Biphenyl and Related Compounds"
from Encyclopedia of Chemical Technology

NEMA Official Standards Proposal

Polychlorinated Biphenyls and the Environment,
Interdepartmental Task Force on PCBs

Decision of the Council on Protection of the
Environment by Control of Polychlorinated
Biphenyls, (13 February, 1973)

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