May 4, 1973

Ms. Mary A. Appelhof
Environmental Health Committee
South Central Michigan Health
Planning Council
R.R. 1, Box 249
Three Rivers, Michigan 49093

Dear Ms. Appelhof:

Your letter dated April 26 was forwarded to me for response since I have been intimately associated with the polychlorinated biphenyl environmental situation.

With increasing evidence that polychlorinated biphenyls were being identified as environmental contaminants and that some mammals, birds and marine life were being affected, Monsanto began in 1970 a program to terminate the sales of PCBs to those applications for which alternative materials were available. The program has now been successfully completed and sales of polychlorinated biphenyls are restricted to dielectric uses in electrical capacitors and transformers in which the polychlorinated biphenyls are hermetically sealed in metal containers. This application is being continued because there are no known fire resistant fluids which can perform in this service. It is our considered opinion, and also of representatives of governmental regulatory agencies, that the fire resistant benefits derived from this application far outweigh the adverse consequences to the environment in the event of an accidental spill. To further minimize environmental impact the fluids we now market have been modified to eliminate the more persistent isomers. Monsanto's total program is based on its desire to dramatically reduce further contamination of the environment and it is an action which we believe any responsible manufacturer would have taken.

The problem of disposing of solid wastes containing polychlorinated biphenyls continue to plague us. Ideally, disposal should be made by exposing the waste to high temperature incineration. Unfortunately, we have not been able to locate commercial incinerators capable of reaching the high temperatures required. Additionally, the problem of segregating and collecting the waste material still remains to be solved. Lacking proper incineration, the only recourse available is the use of authorized, properly-managed dry landfills. It is our considered opinion that, as long as the polychlorinated biphenyl waste is not exposed to water and thereby transported, adverse effects to the environment will be essentially eliminated.

I am including copies of pertinent reports in the event you have not had the opportunity to review them. I hope you find these comments helpful and if I can be of further service please do not hesitate to let me know.

Sincerely,

W. B. Papageorge
Manager
Product Acceptability

WBP/bt

Enclosures

W, X, BB.