PROCEDURE FOR HANDLING THERMINOL FR SERIES SALES

PROBLEM

While action was taken during 1970 to terminate sales of Therminol FR Series products to known food applications, there is evidence that use in some borderline applications is resulting in the appearance of PCB's in either food or animal feed products. The purpose of this procedure is to ensure that we exert maximum control over sales of Therminol FR Series products aimed at ensuring these materials do not contaminate products designed for human or animal use or consumption, and are not allowed to escape into the environment.

POLICY

We will sell the Therminol FR Series products only for applications where we are convinced there is a need for maximum fire resistance and where we are satisfied that there is no possibility of their contaminating intermediates or end products designed for human or animal use or consumption. In addition, we will ensure that all customers using these products are fully aware of the hazards involved and the need for taking adequate precautions to prevent their escape into the environment.

RESPONSIBILITY

The Product Manager Dielectric & Process Fluids Specialty Products Group will be responsible for implementing this procedure and maintaining maximum control over sales of the Therminol FR Series. He will be fully aware of all end uses of these products at all times and will review the current status with the Director of Sales Specialty Products Group once each quarter. He will also be responsible for ensuring that all field salesmen handling these products are fully briefed on the hazards and problems and that they are guiding their customers in line with the policy outlined above.

PROCEDURE

1) The Product Manager Dielectric & Process Fluids Specialty Products Group will maintain an up to date list of all

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approved Therminol FR Series' customers showing application usage in every case. This list will be reviewed once each quarter with the Director of Sales Specialty Products Group to ensure that it is complete and up to date.

2) No new customers for Therminol FR Series products will be accepted without written approval of the Director of Sales Specialty Products Group (in his absence the Business Director Specialty Products Group) and the Manager Environmental Protection.

3) COP files of all Therminol FR Series customers will indicate that they are an approved user. Any orders received from non-approved customers will be submitted to the Product Manager Dielectric & Process Fluids and will not be accepted without written approval from the Director of Sales Specialty Products Group.

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