F — I.P.

INTERNATIONAL PAPER COMPANY

220 EAST 42ND ST., NEW YORK, N. Y. 10017, PHONE 212 682-7500

ERHARD C. KARL, Director of Purchases

March 30, 1972

Xerox for ~~B. G. Tibbetts~~
P.L. Slayton
J.S. Pullman
NTJ/TLG.
JJR/DER/PWK

Mr. Cumming Paton
Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63166

Dear Mr. Paton:

International Paper Company's packaging materials are manufactured in accordance with applicable provisions of the Federal Food, Drug and Cosmetic Act. We would not knowingly use any food contaminants in the manufacture of our packaging materials.

Your letter of March 6, 1972 has been reviewed in the light of the proposed rule of the Food and Drug Administration published in the Federal Register March 18, 1972. According to the proposed rule, food contaminants may result from the use of PCB's in heat exchange fluids. Food and Drug's policy statement and proposed order, if finalized in the proposed form, provides that within 30 days after the effective date of the order, we must have the heat exchange fluid used in our equipment sampled and tested to determine whether it contains PCB's or verify the absence of PCB's in the fluid.

With respect to your letter, as pointed out in the proposed order of the Food and Drug Administration, PCB's are toxic substances which are very stable and highly persistent in the environment. Unfortunately the hazard is not overcome by acknowledgement of discontinuance and the return of any unused or partially used drums of Therminol. Any use by this Company of your heat exchange fluid would be incorporated in closed systems located in various plants of the Company. The burdensome part of the proposed order is the inspection of all heat exchange fluids and replacement of such fluids where necessary. We

should appreciate your advice as to how we might comply with this requirement should its policy statement and proposed order become final in its present form.

We look forward to your reply and assistance on this most troublesome subject.

Yours very truly,

E. C. Karl

ECK:jr
cc: Messrs. J. J. Dillon
A. P. Foster
A. Oetken
A. F. Perkins
T. C. Warren

Called Karl 4/14/72.

(1). Told him 5 loc^ns. converted from FR to T.S.S.

(2) Told him FDA proposals vague in 2 areas:

(i) level of PCB remaining in converted systems.

(ii) Def^n. of harmless/non-deleterious replacement.

(3). Suggested he might want to

(a) check converted systems for PCBs.

We could supply -

- list of labs. to do this
- test methods
- even analyze 5 samples.

(b). Monitor prod^n for PCBs - at least on short term basis.

- test methods
- labs who could do this.

(c) Monitor H.T. systems to prevent leaks

Karl will circulate my input - if they need more help from someone I.P. will call me

MONS 094384