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THERMINOL FR SERIES PRODUCTS

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The problem we are experiencing due to East Coast Terminals contaminating fish meal as a result of a leak in their (Holo-Flite) drying equipment makes it clear that our control of end uses of the Therminol FR Series is far from satisfactory. We must take immediate action to terminate sales of Therminol FR Series products to the following accounts where there appears to be a potential danger of food or animal feed contamination:

LIST NO. 1

Badger Byproducts
BSP Corporation
Commodity Pasteurizing
* East Coast Terminals
National Byproducts
Rietz Corporation
Sav A Stop
Patterson Company

* Action already taken

All of these accounts must be visited this week (July 19-23) and advised of our decision. We should arrange to take back any material in stock, and also the fluid currently in the equipment for incineration at W. G. Krummrich. Where possible we should offer free replacement fluid with Therminol 55, 66, or 77 as appropriate.

To avoid future problems in this area you should contact Western Precipitation (and any other manufacturers of similar equipment) and advise them of the action we have taken. It should be made crystal clear that under no circumstances will we sell the Therminol FR Series of products for use in food or feed applications. We will accept no future orders unless they are willing to disclose the end use applications for which it is required.

Advise me in writing no later than Monday, July 26, that this action has been taken.

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In addition to the above, you should arrange to visit the following companies who are users of the Therminol FR Series of products and are known to be manufacturers of pharmaceuticals, flavors and fragrances. You should obtain definite proof that end use of the Therminol FR Series of products does not result in any possibility of contamination of pharmaceuticals or other products destined for human or animal use or consumption

LIST NO. 2
Abbott Labs
Parke-Davis
Pfizer Corporation
Sandoz Pharmaceuticals
International Flavors & Fragrances

If your investigation indicates there is the slightest possibility of contamination you should immediately terminate sales of all Therminol FR Series products and take action as outlined for List No. 1. As all of these accounts are also served by the Food & Fine Business Group, you should ensure that they are fully informed of the problem.

Advise me of your results in this investigation no later than Friday, July 30.

Although there is no current indication that the use of Therminol FR Series products for "curtain coating" applications is causing contamination problems, I think replacement by 55, 66, or 77 would be an advisable precaution. Please take the necessary action and report progress to me by the end of this month.

To ensure that in the future we have complete control over all end uses of Therminol FR Series sales, I am attaching hereto a procedure which must be implemented effective Monday, July 26. Please take the necessary action and ensure that all interested parties are advised.

JOHN MASON

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Attachment

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

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.

JM 7/19/71