bcc: J. G. Nassif

Monsanto

FROM (NAME—LOCATION—PHONE) J. H. Craddock - G4NH (4-4764)

DATE : April 25, 1983 CC.

SUBJECT : California PCB Standards, Section 5218

REFERENCE :

TO : Rita Hartman - A3NF

The NOTE on Page 1 of the proposed new California OSHA Standard for PCBs which lists trade names for fluids "which contain high concentrations of PCBs" is incorrect and misleading in its present form.

I suggest the following re-wording which is more accurate:

> NOTE: The following are trade names for fluids which might contain high concentrations of PCBs: Aroclor, Asbestol, Askarel, Apirolio, Clophen, Chlorextol, Chlorinol, Clorphen, Diaclor, Dk, Dykanol, EEC-18, Elemex, Eucarel, Fenclor, Hyvol, Inclor, Inerteen, Kaneclor, Kennechlor, Nepolin, No-Flamol, Phenoclor, Phyralene, Pydraul (pre-1972), Pyranol, Pyroclor, Saf-T-Kuhl, Santotherm FR, Santovac 1 and 2, Therminol-FR series.

Suggested changes from the original are highlighted for your convenience in identification. Reasons for the changes are:

> Line 1 - Addition of "might" - Not all of these product formulations necessarily originally contained or now contain PCBs, therefore grammatical use of the conditional form might is appropriate.
>
> Line 6 - Location of the parenthetical (pre-1972) immediately adjacent to the name Pydraul is clearer.
>
> Line 7 - The correct product containing PCBs was the Therminol-FR series. Other Therminol® products, including current products, do not now and never contained PCBs.

J. H. Craddock

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