C. Paton/D.E. Roush
J.S. Pullman - 1650
P.L. Slayton - 1650

November 18, 1971

Mr. Charles J. Windsor
Vice President
Reichhold Chemical Incorporated
525 North Broadway
White Plaines, New York 10602

Dear Mr. Windsor:

With regard to your visit with our Mr. J.S. Pullman we wish to confirm our position regarding the Therminol FR heat transfer fluids.

These products are polychlorinated biphenyls (PCBs). The PCB concentration in our environment has increasingly come under the scrutiny of various governmental agencies and scientific laboratories. Most studies indicate that certain PCBs because of their persistent nature will cause injury to certain forms of bird, aquatic and animal life. The effect on humans long term is not known, thus we have taken steps to prevent the spread of PCBs particularly into the food chain.

We have already instituted a policy where we will no longer sell any FR fluids into new systems no matter what the end use application. We are refusing to sell any makeup fluid to existing systems involved in any way with food, animal feed, pharmaceutical, food packaging or food containers. We have recommended that all of these systems be converted immediately to a non PCB fluid such as our Therminol 55 or Therminol 66. This is the policy we have recommended for the Therminol FR-1 system at your Reichhold plant in Morris, Illinois. They manufacture paper coatings that are used as moisture barriers in food packaging.

We are at the present time still supplying Therminol FR fluids as makeup into existing systems that do not represent a contamination problem.

On any systems that are suspect we are recommending that they be drained completely of FR fluids and replaced as soon as possible. Generally drain and change is adequate, however, some systems may have to be cleaned before refill to eliminate residue Therminol FR.

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We will accept used FR fluid at our Sauget, Illinois plant for incineration and we will absorb the $.03/pound charge normally assessed. On any international systems converted we would suggest that a toxic landfill be used to dispose of the fluid.

We would be most happy to provide assistance in any conversions of Therminol FR systems. Please let us know if you have any questions.

Very truly yours,

James J. Roder
Product Supervisor
Heat Transfer Fluids

lb

Enclosure

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