

OCT 21 1982

Interoffice Communication

To: J. J. Hall
From: R. A. Klein
Date: October 20, 1982

ROUTE TO:	_____
COPIES TO:	_____
FILE:	_____

Subject: (1) LONZA USE OF BIODEGRATION WORK BY PONCA CITY
(2) USE OF CONOCO'S FDA CERTIFICATION ON ALFOL 8 AND ALFOL 10

Attached is a memo from Victor Rincon to Mike Fortier on subject No. 1 above. My feeling is that we ought not to make biodegradability representations to Lonza which Lonza intends to pass on to their customers. Could you please issue a policy statement concerning any potential liability we might incur by allowing Lonza to make biodegradability representations using Ponca City laboratory results.

Secondly, could you contact Harris Halpert to review his discussions with Helena Chemical and R. J. Industries concerning the possible use by Helena of our FDA registration on ALFOL 8 and ALFOL 10 alcohols in a tobacco sucker control agent which Helena intends to manufacture and sell.



R. A. Klein

RAK:dkh

cc: MJF, CFP, HH, DLM, NCF

Attachment

VEV-245056



(4)

Interoffice Communication

To M.J. Fortier
From V.A. Rincon *yichu*
Date October 12, 1982
Subject LONZA USE OF BIODEGRADATION WORK DONE BY PONCA CITY

RECEIVED
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CHEM. MKTG.

Late in 1981, Lonza submitted nine samples of various Lonza products for a biodegradability study to be done by our labs in Ponca City.

This project has been completed and the results have been discussed with Lonza technical personnel.

Lonza is very pleased by the results obtained in R.L. Huddleston's shop and now they would like to get guidelines from Conoco to determine to what extent they can use these results.

In summary, the results indicate that eight items are highly biodegradable and the last one is not.

We need to tell Lonza how much they can lean on the report when they convey the biodegradability message to Lonza customers. Lonza could use these approaches in ascending order of Conoco involvement:

1. Lonza salesmen can review biodegradability issue verbally.
2. Lonza can write a hand-out sheet paraphrasing the results.
3. Lonza can write a hand-out sheet quoting verbatim from the report.
4. Lonza can incorporate results in official product data sheets.
5. Lonza can use approaches 1 through 4 stating that Conoco did the work.

I recommend that Lonza be allowed to use results as indicated in statements 1 through 4. Conoco then remains uninvolved until someone questions the results and Lonza may have to spell out details of the study.

ATTENTION: Distribution

Please comment so I can make appropriate response to Lonza.

V.A. Rincon/cb
V.A. Rincon/cb

cc: RAK, CFP, DRP, WJBV, PTH, OCK, RLH, AMN

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