

policy

22SL - T. L. Gossage

July 16, 1971

THERMINOL FR FLUIDS

B2SA - H. S. Bergen
B2SJ - H. T. Johnson
B2SK - W. D. Papageorge
B2SEJ - J. J. Roder
B2SH - D. E. Roush

J. R. Fallon
B2SH

East Coast Term file

Jack, during your vacation we have been notified of a significant PCB contamination of chicken feed at several chicken farm locations. Upon your return you should review this in some detail with Don Roush. It appears that the source of the PCB contamination is a company by the name of East Coast Terminal in Wilmington, North Carolina, a fish mill processor. Since May of this year, this company has purchased 9 drums of Therminol FR fluid. Additional quantities were purchased by them in August and December of 1970. To date, we have not been able to establish that East Coast Terminal ever received a letter notifying them of potential hazards in dealing with FR fluid. To prevent this type of thing from happening again in the future, several procedures need be established.

*Paul Cuthbert
Marketing File*

First, I want the product group to review all FR sales in 1971 year-to-date. Every company that has purchased must be identified as having received a copy of the earlier PCB notification letter. Any deviations from that must now be covered by a new letter. Further, we must identify the product use for each customer who has purchased in 1971. In those cases where we are unclear on the intended use, the customers must be contacted immediately by telephone to identify the use. Any customers who are now using the FR fluid for food processing (for humans or for animals) will be notified that the material will no longer be made available for those applications. Any exception to this will be cleared by Papageorge and me.

*Procedure
File*

Secondly, on future orders of FR fluids, I want a procedure to be established between the product group and COP whereby no shipments of FR fluids are made until someone in the product group has specifically approved the customer as having been notified of the PCB problem and as having a known and approved use for the fluid. A record will be kept in the product group listing the customer, intended use, confirmation that customer has been notified of PCB problem, date of approval for shipment release by product group, and product group number approving release.

I would like a report from you as soon as you have completed the customer year-to-date analysis, hopefully no later than August 1. August 1 should also be the target date for an acceptable procedure on new customers with COP.

T. L. Gossage

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