Monsanto

FROM (NAME & LOCATION) W. B. PAPAGEORGE -ST.LOUIS

DATE JUNE 14, 1972

cc K. W. EASLEY - 1920

SUBJECT FDA PROPOSED RULE MAKING - PCB

REFERENCE

TO :
~~H.~~ S. BERGEN
W. R. COREY
T. L. GOSSAGE
P. S. PARK
C. PATON
J. F. STAPLETON
E. P. WHEELER

JF The Book Policy - FDA

We will meet Friday, June 16 in Room B-274 at 10:00 a.m. to review plans for commenting on the proposed FDA rule making relating to PCB's in food, food packaging and animal feeds.

Present plans include an informal discussion with appropriate FDA representatives on June 20-21 followed by a written statement submitted to the Hearing Clerk, HEW, before July 16.

Our objectives are:

1. Impress on FDA the impracticality of achieving zero detectable PCB's in converted heat transfer units.

2. Establish if we can continue to market replacement Therminols in food or food related processes.

3. Discuss the legal authority which enables the FDA to regulate PCB's as proposed.

I have attached the following:

1. Copy of Proposed Rule Making.

2. List of pertinent questions to be considered.

3. Summary of known comments submitted to the Hearing Clerk, HEW.

4. Summary of information relating to converted heat transfer systems.

5. Toxicity data - Therminal 55 and Therminol 66.

W. B. PAPAGEORGE

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