9/9/71

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Subject PCB's

(1) FDA afraid they will be crucified by Nader and others for derelection of duty

(2) Definition of "PCB's" is ambiguous — calculated by comparison of chromatogram trace with that of a reference sample — thus material containing 1221 or dichlorbiphenyl would be reported as containing "PCB's". May also be true of new 1109 (essentially biphenyl + monochlor biphenyl — 1% dichlors max)

(3) FDA concerned with presence of "PCBs" in range of 10 to 40 ppb in paper and paper board used for food wrappings and in food so wrapped (Wheaties)

DSW 333700

STLCOPCB4080277

4. Adhesives used in food wrappings must be cleared by FDA, ∴ Monsanto has no legal liability of a third party uses a PCB containing adhesive in an application for which it was not cleared.

5. We will affix a warning sticker on each container indicating that our PCB containing products are not cleared for food product related uses.

6. We will discontinue the use of 1221 in blends with the chlorinated terphenyls.

7. We may substitute 1109 for 1221 in blends with the chlorinated terphenyls.

DSW 333701

8 We will continue to sell chlorinated terphenyls in plasticizer applications.

9. We will repair the present biphenyl - terphenyl column in September and operate it so that biphenyl content of terphenyl is held at 1.5 % max (

10. We will replace 1248 in heat exchange systems with HB 40 to eliminate contamination from leakage.

11. We will install additional column in distillation train to permit reducing biphenyl content of terphenyl to 0.01 to 0.001, and to give quaterphenyls for use in making WCM (hydrogenated QP) use with Santicizer 711.

10 ppm to 100 ppm

DSW 333702

STLCOPCB4080279

12. We have reviewed and received D Bldg clearance on our sales policy in the heat exchanger fluids area — e.g. — sale of PCB containing fluids only to well managed customers who have convinced us they cannot substitute a non PCB fluid + can contain the PCB's.

13. Must formulate, recommend to D Bldg + receive approval on policy for

a) Sale of chlorinated terphenyls containing up to 10 to 100 ppm of PCB's, either alone or mixed with MCS 1109, to plasticizer and adhesive applications

After Jan 1, 1972

b) Sale of hydraulic fluids containing up to 5 to 50 ppm "PCB's"

DSW 333703

STLCOPCB4080280

14. We should define what we mean by PCB's & let regulatory agencies know!

DSW 333704