

AN-1206

[Handwritten signature]

November 13, 1968

Mr. L. T. Camilleri
Technical Manager
HOOKER CHEMICAL CORPORATION
Ruco Division
New South Road
Hicksville, New York 11802

Dear Lou:

A member of your staff, Mr. Fabrizio, telephoned last week regarding the FDA attitude on vinyl resins and more specifically, I believe, how the FDA policies might effect the use of bulk resins in specific applications.

Our original FDA approvals were based on studies done many years ago on Geon resin. It is our attitude that FDA is not concerned about the manufacturing process used to make our different resins. We satisfy ourselves that a resin will present no hazard in a specific application by running the prescribed extraction tests.

It is our present opinion that the manufacture of polyvinyl chloride by the bulk polymerization process will not require new toxicological or feeding studies. We do not now deem it necessary to initiate any discussions with FDA on resin made by this process which, in our opinion, falls within the category of prior sanction resins.

We have been informed that Dow ran extraction studies on the following PSG resins:

- RB 8010
- GB 9010
- GB 1010
- GB 1110
- GB 1210

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Dow data indicated the above polymers can be used in food packaging applications and will comply with FDA requirements under the Food Additives Amendment.

If Mr. Fabrizio wants to be informed on the FDA regulations, we suggest he get from the Food and Drug Administration their food additive regulations that pertain to indirect additives.

Mr. Fabrizio also inquired about the molecular weight of Geon resin 104 which is just a shade lower than Geon resin 103. The inherent viscosity, according to ASTM 1243-60, of our resins is as follows:

Geon Resin 101	-	1.10
Geon Resin 103	-	0.96
Geon Resin 104	-	0.86

If you have any further questions, please let us know.

Cordially,

James S. Wolff/jmm

Sales Manager
Monomers and Petrochemicals

bcc: ✓ W.E. McCormick - Akron
L.R. Jimenez
E.B. Osborne
B.M.G. Zwicker

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