

BFGoodrich

The BFGoodrich Company
Geon Vinyl Division
6100 Oak Tree Boulevard
Cleveland, Ohio 44131
216-447-6000

November 18, 1992

Ed Bisinger
Toxicologist
Akzo Chemicals
300 South Riverside Plaza
Chicago, IL 60606

Dear Ed:

Akzo Chemical provides BFGoodrich with Interstab G8257 WX PWD (our Code L-35) which is used as an ingredient in the production of one of our products.

I have enclosed NSF's Toxicology Data Review Submission (TDRS) "Form B" for completion and submission to NSF within 30 days of receipt. Please forward to:

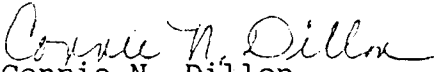
Rebecca L. Collins
Additives Information Specialist
NSF International
3475 Plymouth Road
P.O. Box 130140
Ann Arbor, MI 48113-0140

If you need assistance in completing the form, call the assistance hotline (1-800-252-6010, 9:00 A.M. to 4:00 P.M. EST) which is available exclusively to answer supplier's questions.

If Akzo Chemicals has previously completed a TDRS "A" or "B" form for Interstab G8257 WX PWD, you are not required to complete the form again. Instead you should complete the "Permission to Use TDRS Form Information for Multiple Applicants" attached to the enclosed TDRS B.

Sincerely,

THE BFGOODRICH COMPANY


Connie N. Dillon
Regulatory and Data System Specialist

1117-3/jp

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21603001

GENERAL INFORMATION - FORMS A & B

WHO IS NSF? NSF *International* (NSF) is an independent, not-for-profit organization of scientists, engineers, technicians, educators, and analysts. It is a trusted neutral agency, serving government, industry, and consumers in achieving solutions to problems relating to public health and the environment since 1944. The mission of NSF is to provide clients and the general public with objective, high quality, timely, third-party services at acceptable cost. Services include development of consensus standards, voluntary product testing and certification with policies and practices which protect the integrity of registered Marks, education and training, and research and demonstration, all relating to public health and the environmental sciences.

WHAT IS THE DRINKING WATER ADDITIVES PROGRAM? ANSI/NSF Standard 60 (Drinking Water Treatment Chemicals - Health Effects) and ANSI/NSF Standard 61 (Drinking Water System Components - Health Effects) are voluntary consensus standards developed by regulators, industry, and product users and specifiers under the guidance of NSF and its consensus standards process. Standard 61 addresses two aspects: (1) Do contaminants leach or migrate from the material into the drinking water; and (2) If so, is the level of migration acceptable from a public health viewpoint? Standard 60 addresses direct treatment chemicals and their contaminants and if the levels of these chemicals are acceptable from a public health viewpoint. NSF's Drinking Water Additives program is a third-party Certification which includes auditing, sampling, testing, toxicology review, and evaluation relating to the potential health effects of drinking water products/materials, in accordance with the criteria established in Standards 60/61.

HOW DOES THE PROCESS WORK? The first step toward Certification under NSF Standard 61 requires the Applicant to complete a Product/Materials Information Form (P/MI). After the form is reviewed by NSF, the Applicant is provided with one Toxicology Data Review Submission Form A (TDRS-A), for each material determined to be in contact with drinking water. The Applicant must either complete this form (if the Applicant manufactures the material) OR, forward the form to the appropriate Material Supplier (if the Applicant merely assembles or repackages the material).

The first step towards Certification under NSF Standard 60 requires the Applicant to complete a Toxicology Data Submission-Form A (TDRS-A).

As the TDRS-A forms are received at NSF, a toxicologist will identify ingredients in the material which require additional information. A TDRS-B form will then be prepared for each ingredient and forwarded to the Material Supplier who, in turn, forwards the forms to the appropriate Ingredient Suppliers for completion. Once all of the TDRS forms have been returned, a Formulation Review is conducted by authorized NSF chemists and toxicologists to determine which analytical tests are necessary to evaluate the Applicant's product. During the selection of the testing protocol for potential contaminants, consideration is given to the degree of toxicological concern as well as the economic and practical limitations of the analytical tests within the constraints of the Standard.

Measured contaminant concentrations are normalized to reflect the levels anticipated "at the tap." Regulated contaminants (those which have a Maximum Contaminant Level set by the USEPA) do not require further toxicology evaluation. However, establishing Maximum Allowable Levels for nonregulated contaminants will require additional toxicology review data, either from new toxicology studies initiated at the time of the testing or previously completed and defensible studies. Should additional toxicology data be necessary, NSF toxicologists will work with the Applicant to determine whether or not previous studies or literature sources fulfill the requirements of Standards 60/61.

CONFIDENTIALITY: Only personnel authorized by NSF shall be allowed to review form A and B Applicant and Supplier information, which shall be secured according to NSF Confidential Information Security Procedures. Proprietary information will not be revealed or provided to Applicants or their Suppliers or third parties unless there is prior notarized written approval. However, the sharing of toxicological information between companies is encouraged where such sharing may expedite product certification.

WHERE TO SEND THIS FORM: Insert the completed form in an envelope marked "CONFIDENTIAL BUSINESS INFORMATION," seal in an outer envelope, and return to:

VIA US MAIL:

Additives Toxicology Group
NSF *International*
PO Box 130140
Ann Arbor, MI 48113-0140 USA

VIA COURIER SERVICE

Additives Toxicology Group
NSF *International*
3475 Plymouth Road
Ann Arbor, MI 48105 USA

(Over for General Instructions -TDRS Forms A and B)

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Date _____

Ingredient Supplier's Representative

Company Name

Address

Applicant's Product: _____

As a material supplier for NSF *International* (NSF) Certification under ANSI/NSF Standard 61 (Drinking Water Additives program), information is required from each of our Ingredient Suppliers regarding ingredients used in our products. Please complete the attached Toxicology Data Review Submission form (TDRS-B) for your product and mail it to NSF within 30 working days. All information supplied to NSF by you will be held in strict confidence. Only NSF authorized personnel will have access to this information. The completeness and timeliness of your response is important to expediting our application.

If previously you submitted a TDRS form for this product on behalf of another manufacturer, please do not complete the TDRS form again. Instead, authorize NSF's use of your original TDRS form in support of our product by completing the last page of the attached form only.

If assistance is needed in completing the TDRS-B form, please do not hesitate to call the NSF Ingredient Supplier Hotline (800/252-6010) which has been established to answer ingredient supplier questions. If you act solely as a distributor for this ingredient, please forward this correspondence immediately to the manufacturer(s) that supplies your organization.

I would like to thank you in advance for your assistance in expediting our application. Your cooperation is appreciated.

Sincerely,

Material Supplier Representative

Company

IMPORTANT: PLEASE DO NOT PHOTOCOPY THE ENCLOSED TDRS FORM B FOR USE WITH OTHER INGREDIENTS: The Document Control Code(s) are product Specific.

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21603004

Initial if NSF
Std. 60/61-Listed

NSF USE ONLY []
Document Control Code: PL00471-003
Supplier Co. No. I7883
Accepted By _____

TOXICOLOGY DATA REVIEW SUBMISSION - FORM B
NSF *International* (NSF)
STANDARD 60/61: DRINKING WATER SYSTEM COMPONENTS
(CONFIDENTIAL INFORMATION)

FOR ASSISTANCE: 1-800-252-6010
From 9am to 4pm Eastern Time

TO BE COMPLETED BY INGREDIENT SUPPLIER, unless the ingredient is currently Certified under NSF Standard 60 or 61 or has preliminary acceptance by NSF. (See Instructions Before Completing).
Please return form within 30 days or call for assistance.

I. IDENTIFICATION INFORMATION

Company name AKZO CHEMICAL Company contact _____
Address _____ Telephone Number () _____
_____ FAX Number () _____
_____ Plant name _____ Plant contact _____
Address _____ Telephone Number () _____
_____ FAX Number () _____

1. Name of chemical or material (use acceptable chemical nomenclature) _____
2. Trade Designation INTERSTAB G8257 WX PWD
Please specify other names under which you market this product _____
3. Structural formula, if applicable (Note: $C_7H_{12}O_4$ is NOT structural) _____
4. Chemical Abstracts Services (CAS) number (if applicable) _____

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21603007

3. A toxicology literature search provided by your company may expedite the toxicology review and minimize costs to the applicant for obtaining toxicology data. For each literature search appended to this form, itemize as described below:

Database	_____	_____	_____
File #	_____	_____	_____
Keywords	_____	_____	_____
Date	_____	_____	_____

____ (Check if no literature search has been, or will be, conducted by your Company.)

VI. ATTACHMENTS AND SIGNATURE

List Attachments to this form	_____	No. of pages	_____
	_____		_____
	_____		_____

I hereby certify that the information provided is accurate and complete, and that I, and the Company I represent, know of no reason the product described herein should not be used in the Applicant's product which is used in contact with drinking water.

X Signature _____ Date _____

Typed or printed name _____

Position/Title _____

Company _____

Phone _____ Telex _____ FAX _____

The following authorization is OPTIONAL. It in no way authorizes NSF to share the information with other Applicants. Authorized NSF staff ONLY will be allowed access to this information. By completing this authorization, this Form B may be used to support the referenced ingredient/material/product as part of another applicant's package.

I give NSF permission to use the information contained in this TDRS Form B as a basis for reviewing/accepting other products which use the referenced ingredient/material/product covered by this form.

Optional Authorization _____

WHERE TO MAIL? Insert the completed form in an envelope marked "CONFIDENTIAL BUSINESS INFORMATION," seal in an outer envelope, and return to:

VIA U.S. MAIL:

Additives Toxicology Group
NSF International (NSF)
PO Box 130140
Ann Arbor, MI 48113-0140

VIA COURIER SERVICE:

Additives Toxicology Group
NSF International (NSF)
3475 Plymouth Road
Ann Arbor, MI 48105

Permission to Use TDRS Form Information For Multiple Applicants

To be completed when a TDRS form for a particular product has previously been submitted to NSF International (NSF) and that information is authorized for use with other applicant(s).

Dear NSF:

Our company, _____, previously submitted a TDRS form for our product _____ under the Document Control Code (found in the upper right hand corner of the original submission): _____.

Permission for NSF to use the above-referenced TDRS form, accompanying information, and appended toxicology data is now given for the following applicant(s) to the NSF's Drinking Water Additives Program.

_____ All applicants

_____ Only the following company

Company Name: _____

Document Control Code (found in the upper right hand corner of the requested submission): _____

I understand that the files will remain confidential and closed to all, but NSF authorized personnel, according to NSF Confidential Information Security Procedures.

Name _____

Signature* _____

Company (Ingredient Supplier) _____

Telephone Number _____ Date _____

***Signature must be notarized:**

Subscribed and sworn to before
me this _____ day
of _____, 19____.

Notary Public

My Commission Expires: _____



NSF International

11/13/92
 Letter to
 Mr. Dillon
 11/13/92

November 3, 1992

Ms. Connie Dillon
 BF Goodrich
 6100 Oak Tree Blvd.
 Cleveland, OH 44131

Dear Ms. Dillon:

We have received the updated formulations you submitted for Geon White 127, Nat 021 and Gray 260. Additional information is required from two of your suppliers.

I have enclosed two TDRS-B forms to be sent to Akzo and General Electric for completion.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Rebecca L. Collino

Rebecca L. Collino
 Information Specialist
 Additives Toxicology

↓
 Richard Brook
 General Electric Co.
 Parkersburg, WV 26102

Enclosures: TDRS-B (2)

3475 Plymouth Road
 PO Box 130140
 Ann Arbor, MI 48113-0140

I am Mayzak 312/906-7823
 Regulatory

Ed Risinger
 416-7588

21603011