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INTER-OFFICE MEMO

TENNECO CHEMICALS, INC.

TO M. Freifeld AT Piscataway DATE July 5, 1973
FROM W. C. Champion AT Flemington COPY TO H. B. Carr
Dr. R. T. Gottesman
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SUBJECT SHIN-ETSU RESINS - FDA STATUS

The use of chemical UG as a "short stop" in the Shin-Etsu process resins will make FDA acceptability of these resins questionable if the chemical is retained on the resin. Chemical UG has FDA sanction for the following uses:

- 121.2514 - Resinous and Polymeric Coatings: Phenolic resins only
- 121.2520 - Component of Adhesives
- 121.2574 - Polycarbonate Resins: Reactive component
- 121.2579 - 4,4' Isopropylidenephenoepichlorhydrin resins: Reactive component
- 121.2585 - 4,4' Isopropylidenephenoepichlorhydrin Thermosetting Epoxy Resins: Reactive component

Only 121.2520, "Components of Adhesives," would permit use in PVC, and this paragraph allows only limited direct contact with food. There is no FDA listing which would support use of chemical UG in packaging film, sheet or bottles.

In light of this, three approaches are available:

1. Petition FDA for use of chemical UG under paragraph 121.2566 "Antioxidants and/or Stabilizers for Polymers."
2. Utilize an ingredient such as butylated hydroxy toluene, (Ionol CP), which already has a listing under 121.2566.
3. Satisfy ourselves that no residual chemical UG is present in the resin, and therefore would not become a food additive. In this case, a petition to FDA would not be required.

We would propose that approach #3 be pursued, since it is probable that no free chemical UG would be present in the finished resin under the conditions of use prescribed by Shin-Etsu.

W. C. Champion
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