

The BFGoodrich Company
3925 Embassy Parkway
Akron, Ohio 44313-1799

September 13, 1990

Mr. Garret Giffin
Pacific Plastics
2005 - 87th Avenue, South
Kent, Washington 98031

SUBJECT: GEON 110X500 FDA STATUS

Dear Mr. Giffin:

Mr. Glen Schaaf asked that I write to you regarding the FDA status of Geon 110X500. Geon 110X500 is a homopolymer polyvinyl chloride (PVC) resin. Polyvinyl chloride is prior sanctioned for use in general food contact applications, both flexible and rigid. The prior sanction is based on an article by A. J. Lehman, from the FDA, published in the Journal of the Association of Food and Drug Officials, July, 1951. The current Good Manufacturing Practice (GMP) specifications for prior sanctioned PVC are a maximum volatility of 3.0% (1 hour at 105°C) and an inherent viscosity of not less than 0.35 by ASTM D-1243-79. Geon 110X500 meets the GMP specifications for prior sanctioned PVC and therefore meets the current requirements of the FDA for general food contact applications.

PVC is also listed as an acceptable ingredient of food contact articles under 21CFR:

175.105	177.1200
175.300	177.2250
176.180	179.45
177.1010	

If you have any further questions, please call me at 216/374-3422.

Sincerely,

THE BFGOODRICH COMPANY

W. C. Bachtel

W. C. Bachtel
Toxicologist
Environment, Health and
Safety Management Systems

0913-1/jp

BFG07660

20378001

Telephone: 216-374-4366
Fax: 216-374-2238

BFG07661

20278002