

ETHYL CORPORATION

C. M. NEHER
SENIOR VICE PRESIDENT

September 8, 1977

Hearing Clerk
Food and Drug Administration
Department of Health, Education
and Welfare
Room 4-65
5600 Fishers Lane
Rockville, Maryland 20852

Docket No. 75N-0190 - Notice of
Proposed Rulemaking re Vinyl
Chloride Polymers in Contact with
Food, 40 Fed. Reg. 40529 (9/3/75)

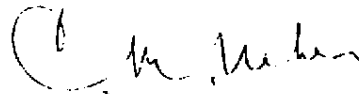
Dear Miss Peterson:

Attached is a position paper which ties together the submissions of June 6, 1977, June 27, 1977, July 18, 1977 with the most recently developed data from experiments proposed to FDA on January 19, 1977.

The conclusions that have been demonstrated are:

1. There is a "Non-Migration" level of Vinyl Chloride Monomer (VCM) from Polyvinyl Chloride (PVC) bottle to contents.
2. The process can be controlled.
3. Therefore, there is NO reasonable expectation of VCM migrating from bottle to contents.
4. The Ethyl Corporation respectfully requests concurrence of these conclusions.

Sincerely,



Clarence M. Neher, Ph. D.
Senior V. P. and Director

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attachment

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