

The BFGoodrich Company
3925 Embassy Parkway
Akron, Ohio 44333-1799

September 18, 1991

Mr. Julius P. Rakus
Alpha Chemical & Plastics Corp.
1 Jabez Street
Newark, N.J. 07105

SUBJECT: GEON 31 FDA STATUS

Dear Mr. Giffin: *Rakus*

Bob Campbell asked that I write to you regarding the FDA status of Geon 31. Geon 31 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 31 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 216/374-4534.

Sincerely,

THE BFGOODRICH COMPANY

R. K. Hinderer jpp

R. K. Hinderer
Toxicologist
Environment, Health and
Safety Management Systems

0913-1/1b

22503001

START

BFG21255

Bob - 8/13/91
Julius Rakus AUG 14 1991
would like a

letter from BFG
stating the status
of Gen 31 for
food contact uses.

Bob C.

ATTENDEE LIST
COSMETIC PACKAGING MATERIALS COMMITTEE
WASHINGTON, DC
3/91

Chemicals Inc Jerry H. Durham C
Akzo Engineering Plastics Inc H
P.O. Box 625
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Dom 656

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Earl Parker
Chevron Chemical Co.
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Vera Parker
Chevron Chemical Company
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Orange, TX 77630
409-882-2160

22503002

BFG21256

ROUTE TO: BATH COMPUTER ROOM

* GEON VINYL TECHNICAL DOCUMENT *

R103360

GEON VINYL RECIPE

09/05/91 11:52:43

GEON RESIN 31

LOC: 15 DEPT: 5163

ISSUE: 004

COMMODITY NO.: 00031 000 0000

EFFECTIVE DATE: 05/21/91

SBC NBR: 1112

DELETE FLAG: NO

LAB REF:

CMPR:

BASED ON:

APPLICATION:

PARTS	INGREDIENTS	SEQ LOC	PERCENT
100.00000	968 000039 6611	001	128.674
.02400	957 00W013 PVA, 38%	002	.031
.02500	953 00G098 METHOCEL F50 PREMIUM	003	.032
.03750	953 00G097 SBF	005	.048
.00450	953 00G044 ATSC	006	.006
.11530	957 00W067 NONIONIC SURFACTANT	008	.148
.50000	953 720080 POLYVIC S-404W	009	.643
	951 00C047 CAUSTIC SODA 50%	010	
	968 000039 6611	011	
77.71600		TOTAL	100.000

TYPE SAMPLE:

MATCHED TO:

ISSUED:

MARKETING APPROVAL:

22503003

BFG21257

Pick letters to combine

1/ F

1 items saved as set 1

Continue picks or requests

2/ DISPLAY AN,PRODNAME,CHEMCOMP

Item 1

ACCESSION NUMBER 798

NAME,SUPPLIER,MSDS YR

POLIVIC S-202W,3V CORP,89

POLIVIC S-404W,3V CORP,89

CHEMICAL COMPOSITION 00=VINYL ACETATE/VINYL ALCOHOL COPOLYMER EMULSION;
01=POLYVINYL ALCOHOL PARTIALLY HYDROLYZED;02=METHANOL;
03=WATER;

2/

Pick letters to combine

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03=WATER;

2/ DISPLAY AMT

Item 1

AMOUNT (PERCENT COMP) 00=100%;01=42-55%;02=<3%;03=45-58%;

2/

22503004

BFG21258