

BAKELITE COMPANY
A DIVISION OF UNION CARBIDE AND CARBON CORPORATION

COPY

Mr. A. J. Dragonette/
W. J. Canavan
Mr. M. Kovach/T. R. Orme
✓ Dr. T. W. Hale
Mr. H. F. Robertson
File: 8.0221 W

April 11, 1957

Mr. G. A. Crapple, Director
Research and Technical Division
Wilson A. Company
4200 South Marshfield Avenue
Chicago 9, Illinois

Dear Mr. Crapple:

On August 3, 1956 Dr. T. W. Hale, Medical Director of Union Carbide and Carbon Corporation, wrote to Mr. R. M. Mehurin, Chief, Laboratory Section, Meat Inspection Branch, Agricultural Research Service, U. S. Dept. of Agriculture, Washington 25, D. C. Copies of the letter were sent to Mr. A. J. Lehman of the Food and Drug Administration and Dr. Iyle Davis of the Poultry Inspection Branch. The letter listed various rigid vinyl sheeting formulations along with the formulation for VBA 9023 Natural, our flexible cast film recommended for food packaging. The subject of the letter was marked "Rigid Vinyl Sheeting Colored". The enclosed copy of a letter from Mr. R. D. Wenger, Assistant Chief, Inspection Branch, Poultry Division to Dr. T. W. Hale will show that this letter of August 3 was received by the FDA. In Mr. Wenger's letter to Dr. Hale he quotes directly from a letter which was received from the Food and Drug Administration discussing the formulations listed in Dr. Hale's letter of August 3. It is possible that the FDA filed the letter of August 3 under rigid vinyl sheeting, as the letter was titled, and completely overlooked the reference to the VBA 9023 Natural cast film.

We are very sorry that you were inconvenienced in your attempts to obtain the necessary approvals from the FDA. Because of the trouble you had, we are again writing to the FDA, the Meat Inspection Branch, and the Poultry Inspection Branch giving our complete formulations of the rigid vinyl sheeting and cast film which we are promoting for food packaging. I would suggest that you again write the FDA mentioning the letter of August 3, 1956 from Dr. T. W. Hale to Mr. R. M. Mehurin, a copy of which was sent to Dr. A. J. Lehman. When we again write to the three agencies involved, we shall be sure to inform you of the date of the letter and the people involved.

If we can help in any other way, we shall be glad to do so.

Very truly yours,

D.C.K.

D. C. Kay

New Product Engineering Department

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Dr. Hale
Enc.

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INDUSTRIAL MEDICINE &
TOXICOLOGY DEPARTMENT

UNITED STATES DEPARTMENT OF AGRICULTURE

~~RECEIVED OCT 15 1956~~
Agricultural Marketing Service
WASHINGTON 25, D. C.

October 10, 1956

Dr. Thomas W. Nale
Medical Director
Union Carbide and Carbon Corporation
30 East Forty-Second Street
New York 17, New York

Dear Mr. Nale:

In our letter of September 21, 1956 we informed you that we were referring to the Food and Drug Administration copy of your letter to Mr. Mehurin regarding the suitability of Rigid Vinyl Sheeting Colored for packaging material to be used on poultry.

We have received the following information from the Food and Drug Administration:

"At the present time, we consider the formulations listed in Dr. Nale's letter as acceptable from the standpoint of the Federal Food, Drug, and Cosmetic Act.

It is, however, in order to point out that the color used, FD&C Yellow No. 1, has recently been the subject of extensive pharmacological studies and consideration is now being given to the possibility of removing this color from the list of those eligible for certification for food use. If this step is taken the color would then not be suitable unless it can be demonstrated that none of the color leaches out into the poultry. It might be that at that time the firm would prefer, in lieu of running extraction tests, to consider substituting FD&C Yellow No. 5 for FD&C Yellow No. 6, for the FD&C Yellow No. 1 in the vinyl film."

In view of the above comment, we would not offer any objection to the above mentioned item in packaging material at this time.

Very truly yours,

R. D. Wenger

R. D. Wenger
Assistant Chief
Inspection Branch
Poultry Division

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NATIONAL BUREAU OF
TOXICOLOGY DEPARTMENT

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D. C. KAY



4200 South Marshfield Avenue
RESEARCH AND TECHNICAL DIVISION

~~XXXXXXXXXXXXXXXXXXXX~~
CHICAGO 9, ILLINOIS

April 1, 1957

Mr. D.C. Kay
New Product Engineering Department
Bakelite Company
30 East 42nd Street
New York 17, New York

Dear Mr. Kay:

Mr. J.A. Thurston of the Robert Gair Division of the Continental Can Company, Inc., had advised us that Bakelite film VBA9023 had been cleared with the Food and Drug Administration for use on food products. As you know, we plan to use this film in contact with dressed poultry.

In order that we might have confirmation from the FDA and from the Department of Agriculture of the acceptability of both the film and the adhesive we plan to use, I wrote to Dr. A.J. Lehman of the FDA and to Dr. Roy W. Willie, of the AMS, USDA. This morning I received a letter from Mr. Chester T. Hubble, a photo copy of which is attached.

It appears that the FDA does not have on file the composition of your film. As you have not divulged to us the composition of the resin, we cannot proceed further in obtaining the necessary approvals. Will you please send the needed information to either the FDA or to me. Incidentally, the manufacturer of the adhesive supplied us with its composition and, as you can see from the attached, we obtained quick approval.

Inasmuch as we intend to conduct the proposed poultry packaging operation in a government-inspected plant, we cannot proceed with this project until the film is approved. We will appreciate anything you can do to expedite this matter.

Very truly yours,

G. A. CRAPPLE, Director
Research and Technical Division

GAC:z
Enc.

CC: Mr. J.A. Thurston

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DEPARTMENT OF
HEALTH, EDUCATION, AND WELFARE
FOOD AND DRUG ADMINISTRATION
WASHINGTON 25, D. C.

March 29, 1957

Mr. G. A. Crapple
Research and Technical Division
Wilson & Company
4200 South Marshfield Avenue
Chicago 9, Illinois

Dear Mr. Crapple:

We are replying to your letter of March 19 to Dr. Lehman concerning your plastic film and an adhesive to be used in contact with dressed poultry.

On the basis of the information supplied, the adhesive is considered acceptable for the purpose indicated.

We are unable to comment on the acceptability of the plastic film in the absence of complete information as to its ingredients. If you are able to obtain from The Bakelite Company and supply to us the composition of their resin VBA9023, we may be able to comment favorably on the use of the film.

We are sorry that we cannot be more helpful at this time.

Sincerely yours,



Chester T. Hubble
Assistant to the Director
Bureau of Enforcement

BAKELITE COMPANY
A DIVISION OF UNION CARBIDE AND CARBON CORPORATION

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Regd Vinyl Shelling

✓ Mr. L. G. Howard
✓ Dr. T. W. Nale
Mr. T. R. Orms
Mr. H. F. Robertson

File: 8.0221 M

April 11, 1957

File

Mr. C. J. Donnelly
The E. B. Miller Coffee Company
1322-34 Blake Street
Denver 2, Colorado

Dear Mr. Donnelly:

We are sorry but we are unable to give you the direct guarantee that you wish stating that our cast vinyl film, VBA 9023 Natural, will hold cream indefinitely without causing any toxic poisonings or other conditions that would be harmful to the human body as you requested in your letter of February 25. For the information on toxicity that you desire, we suggest that you write directly to Dr. A. J. Lehman, Chief, Division of Pharmacology, Food and Drug Administration, Dept. of Health, Education and Welfare, Washington, D. C. We have already filed with the FDA the complete formulation of our VBA 9023 Natural cast vinyl film. Dr. Lehman would be well able to advise you as to the suitability of this film for any possible application you may have in mind.

If we can be of any further service, or if you have any difficulty obtaining the desired approval from Dr. Lehman, don't hesitate to call on us and we shall do what we can to help.

Very truly yours,

D. C. Kay

D. C. Kay
New Product Engineering Department

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INDUSTRIAL MEDICINE &
TOXICOLOGY DEPARTMENT