



THE PROCTER & GAMBLE COMPANY

IVORYDALE TECHNICAL CENTER

CINCINNATI, OHIO 45217

November 4, 1982

Mr. Jerome H. Heckman
Keller and Heckman
1150 17th Street, N.W.
Suite 1000
Washington, D.C. 20036

Dear Jerry:

Confirming our telephone conversation of yesterday, our experience at Procter & Gamble supports the view that SPI advise FDA that manufacturers of rigid and semi-rigid PVC food packaging can meet a RVCN limitation of 10 ppb in their finished articles.

Our recent experience in checking RVCN in five different lots of PVC bottles from three different bottle manufacturers is offered as evidence for our support. Analyses showed results in the range of 3-7 ppb, with an average of 4.2 ppb RVCN. In all cases, Hooker's PVC 2150L was the basic resin used.

If comments from other SPI members do not verify our findings, or if it is decided that the PVC industry will not commit to a 10 ppb RVCN limit for food packaging, I would like to discuss this situation with you promptly.

I look forward to the next meeting of our Food, Drug & Cosmetic Packaging Materials Committee on December 8, when we will undoubtedly be discussing this subject further.

Sincerely,


R. E. Belliveau

jmh

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