DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
FOOD AND DRUG ADMINISTRATION
WASHINGTON, D.C. 20204

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November 1, 1966

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Dr. R. Emmet Kelly
Medical Director
Monsanto Company
800 North Lindbergh Boulevard
St. Louis, Missouri 63166

Re: Food Additive Petition No. 7B2117

Dear Dr. Kelly:

This acknowledges receipt of your letter of October 20, 1966, transmitting a petition to amend § 121.2520 to provide for the use of chlorinated terphenyl (60 percent chlorinated) in polyvinyl acetate and also in ethylene-vinyl acetate adhesives used in food packaging applications. In a telephone conversation on October 31, 1966, Dr. Early identified the subject chlorinated terphenyl as your product "Arochlor 5460."

This petition has been designated as Food Additive Petition No. 7B2117.

In the light of recently completed toxicity studies we have serious reservations concerning any use of chlorinated terphenyl which could result in any addition of chlorinated terphenyls to food.

If you would like to discuss this matter in detail with our scientists we would be glad to make arrangements for you to meet with them at any mutual agreeable time.

Sincerely yours,

William F. Randolph

William F. Randolph
Petitions Control Branch
Bureau of Science

cc: Dr. Jack Early
Monsanto Company
1101 - 17th Street, N.W.
Washington, D. C. 20006

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