



INTERNAL CORRESPONDENCE

CHEMICALS AND PLASTICS

RIVER ROAD, BOUND BROOK, NEW JERSEY 08805

To (Name) (See Distribution List)
 Division
 Location

Date May 8, 1974
 Originating Dept. Research & Development

Answering letter date

RECEIVED

Copy to

Subject

MAY 13 1974

R. N. WHEELER JR.

The attached letter dated May 8, 1974 was sent to the following customers with reference to the indicated resins:

CUSTOMER

Dr. Stewart W. Gloyer
 Technical Division, Coatings &
 Resins
 PPG Industries, Inc.
 1 Goleway Center
 Pittsburgh, Pa. 15222

Mr. Robert P. Carter
 Aluminum Company of America
 1501 Alcoa Building
 Pittsburgh, Pa. 15219

Mr. James Stillwagon
 Alcoa Laboratories
 Alcoa Tech. Center
 Alcoa Center, Pa. 15069

Mr. J. D. Gibbs
 Aluminum Company of America
 P. O. Box 488
 Richmond, Indiana 47374

Mr. George White
 Packaging Research Division
 Reynolds Aluminum
 10th and Byrd Streets
 Richmond, Virginia 23219

RESINS

Solution vinyl resins
 VAGH, VMCH, VYHH, VYLF, VAGD,
 and dispersion resin QYNV

Solution vinyl resins VMCH,
 VMCA, VMCC, VAGH, VAGD, VYHH,
 VYHD, VYDS, VYLF, VYNS and
 dispersion resins QYKV-A and
 QYOH-2A

Solution vinyl resins VMCH,
 VMCA, VMCC, VAGH, VAGD, VYDS,
 VYHH, VYHD, VYLF, VYNS and
 dispersion resins QYKV and QYOH

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CUSTOMER

Mr. L. F. Turner
Kaiser Aluminum and
Chemical Corporation
177 South Airport Blvd.
South San Francisco, Calif. 94080

Mr. A. Bradley
Inmont Corporation
L-5 Factory Lane
Bound Brook, New Jersey 08805

Mr. James M. Drubel
International Paint Company
Morris and Elmwood Avenues
Union, New Jersey 07083

Mr. R. Wilkinson
International Paint Company
Morris and Elmwood Avenues
Union, New Jersey 07083

Mr. P. K. Wolper
Manager, Packaging Research
Rexham Corporation
Flemington, New Jersey 08822

RESINS

Solution vinyl resins
VMCH and VYHH.

Solution vinyl resins
VYHH, VAGH, VYNS-3, and
dispersion resin QYNV-1

Solution vinyl resins
VMCH, VYHH and VAGH

Solution vinyl resins
VAGH, VMCH, VYHH

W. B. Ackart
W. B. Ackart

WBA:deb
att.

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UNION CARBIDE CORPORATION
CHEMICALS AND PLASTICS

RIVER ROAD, BOUND BROOK, N. J. 08805 - TELEPHONE (201) 356-8000

Dear Sir:

Your request for information regarding the food additive status of "BAKELITE" brand vinyl resins when used in contact with foods has been referred to me.

We have been informed that the Food and Drug Administration is considering the revocation of the prior sanctioned status of vinyl resins for use in food contact applications pending the completion of a two year animal feeding study. Our information is that an interim food additive regulation will be issued that will permit the continued use of vinyl resins in contact with foods provided the residual vinyl chloride monomer content of the food contact material is less than 10 ppm and there is no detectable monomer migration to food from the fabricated item using an analytical method capable of showing 50 ppb in the food.

The residual vinyl chloride monomer content of the various Bakelite brand vinyl resins will vary depending upon the polymerization process used. Vinyl resins made by the solvent polymerization process and the dispersion (emulsion) process as supplied by Union Carbide Corporation involve processing operations not conducive to the retention of significant vinyl chloride monomer residues in the resin. Such resins are recovered in an extremely fine form thereby providing a surface-to-volume ratio highly favorable to efficient removal of residual monomer. The retained vinyl chloride monomer content of these PVC resins is not and has not been a specification parameter and is not therefore a measured value we can furnish from accumulated historical data. We can, however, advise you that on the basis of our

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ongoing surveillance program BAKELITE solvent polymerized resins to date have been found to contain no detectable free vinyl chloride monomer when analyzed by a gas chromatographic method sensitive to 1.5 ppm VCM.

On the same basis the vinyl chloride monomer contents of our dispersion resins have been found to vary from undetectable levels to about 5 ppm.

This information applies to the following BAKELITE brand vinyl resins that we supply you:

We believe that these resins when used in contact with foods under conditions of good manufacturing practice will conform to the expected interim requirements of the food additive regulations (10 ppm maximum in the food contact article and no detectable migration to food).

Very truly yours,

W. B. Ackart
Manager, FDA Liaison

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DISTRIBUTION

BOUND BROOK

Gorham, W. F.
Peacock, G. S.
Reinking, N. H.

SOUTH CHARLESTON

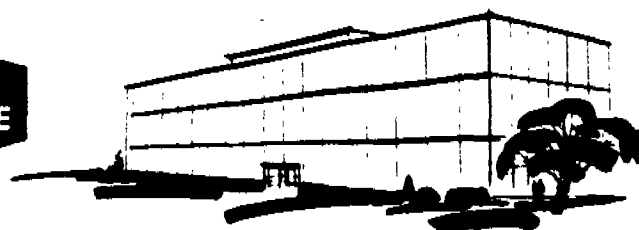
Brezinski, J. J.
Fanna, R. J.
Wheeler, R. N.✓

NEW YORK

Annonio, R. W. - 33
Bigelow, G. P. - 33
Dernehl, C. U. - 4
Gulick, R. E. - 32
Hardman, D. E. - 33
Steele, A. B. - 28
Whittlesey, J. W. - 46
Wood, W. L. - 47
Zutty, N. L. - 32

TARRYTOWN

Colwell, C. E.
Niehaus, W. R.



TECHNICAL SERVICE BULLETIN

RESEARCH AND DEVELOPMENT DEPARTMENT

OSHA CONSIDERATIONS IN THE USE OF

BAKELITE®POLYVINYLCHLORIDE DISPERSION

AND SOLVENT TYPE RESINS

On April 5, 1974, the Occupational Safety and Health Administration, Department of Labor, published an "Emergency Temporary Standard for Exposure to Vinyl Chloride" in the FEDERAL REGISTER, pages 12342-12344. A copy of this reference is attached. The scope and application of this temporary standard is defined in §1910.93q.(a) and we advise that you determine the applicability of this standard to your manufacturing operation. You will note that initial monitoring operations were to begin no later than April 22, 1974.

The retained vinyl chloride monomer (VCM) content of our PVC resins is not and has not been a specification parameter and accordingly is not a measured value we can furnish from accumulated historical data. We have initiated a surveillance program which is intended to provide range guidelines applicable to the retained VCM content of our various resin types. On the basis of program results to date we can inform you that the BAKELITE dispersion and/or solvent types of polyvinyl chloride resins of interest to you have generally been found to contain no detectable free vinyl chloride monomer when analyzed by a gas chromatographic method sensitive to 1.5ppm VCM. This result is not cited as a specification or as a guarantee of any sort for our products but as a range guideline to assist you in your appraisal of possible source contributors of VCM to your occupational environment.

Please direct inquiries with respect to OSHA considerations to:

W. R. Niehaus
Chemicals and Plastics
Tarrytown Technical Center
Tarrytown, New York

/slm
TT-TL- 976

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UNION CARBIDE CORPORATION • CHEMICALS AND PLASTICS | TARRYTOWN TECHNICAL CENTER, TARRYTOWN, NEW YORK

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