

BFGoodrich**INTER-ORGANIZATION CORRESPONDENCE**

TO	R. C. Wilging	FIELD POINT OR DEPT. & BLDG. NO.	Cleveland Chemical	DATE YOUR LETTER
FROM	W. C. Bachtel	FIELD POINT OR DEPT. & BLDG. NO.	Akron - D/0020, 5-H	DATE THIS LETTER
SUBJECT	FDA STATUS OF PVC			2-7-80

FDA STATUS OF PVC

This is to summarize our discussion relating to the current and future FDA status of PVC food contact articles.

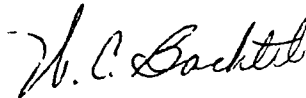
Currently PVC is prior sanctioned for general use in contact with food. In a letter dated Oct. 15, 1979 to the GTR Chemical Company (copy attached) the FDA reconfirmed the prior sanctioned status of PVC. On the same date, Food Chemical News reported on an internal FDA memo which recommends the realistic handling of the PVC problem; I enclose a copy of this report from FCN.

As a result of such activities, along with the recent acrylonitrile decision, the SPI has petitioned the Bureau of Tobacco, Alcohol and Fire Arms (BTAF) to again permit the use of PVC liquor bottles. In so doing, the SPI has asked the FDA to reaffirm the prior sanctioned status of PVC to the BTAF.

As for the USDA, they will follow the actions taken by the FDA. Consequently, those letters from the USDA giving acceptance for the use of various BFG PVC materials remain in effect so long as the composition and use remain the same, or until officially rescinded by the USDA.

As for potable water systems, the EPA has jurisdiction and works closely with the National Sanitation Foundation (NSF). The NSF has set standards for PVC pipe resins which include a limit on the residual vinyl chloride level.

Unless there is undue pressure from various so-called consumer groups, I do not foresee any immediate serious troubles for PVC food contact articles.



W. C. Bachtel

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cc: R.W. Strassburg

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