

AN 5137

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TO	J.S. Kim	FIELD POINT OR DEPT. & BLDG. NO. Avon Lake T.C.	
FROM	W.C. Bachtel	FIELD POINT OR DEPT. & BLDG. NO. Akron - D/0020, 5-H	DATE THIS LETTER 8-28-85
SUBJECT	<u>FDA Acceptability of Experimental Can Coating Resins</u>		

I reviewed the resins and hydrosol formulation in your memo of 8/21/85 for their FDA acceptance as can coatings under 21 CFR 175.300 "Resinous and Polymeric Coatings". I have the following comments.

Resin A

This formulation is acceptable for can coatings provided the coating is dried at a temperature of at least 193°C (380°F) for 4 minutes. The drying limitation is based on the use of Surfynol 104.

Resin B

A terpolymer of vinyl chloride-vinylidene chloride and acrylamide is not acceptable; only those vinyl chloride copolymers listed under 175.300(b)(xv) may be used.

Resin C

This resin is acceptable without restriction under 175.300.

Hydrosol Formulation

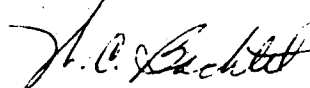
This formulation is not acceptable regardless of the status of Resins A, B, or C due to the use of morpholine and Thermolite 831. The only FDA clearance for morpholine is in certain fruit coatings, defoaming agents for paper and paperboard manufacture, and as a corrosion inhibitor for steel or tinplate.

Thermolite 831 or any of the octyltin stabilizers may only be used with homopolymer PVC resins or vinyl chloride-ethylene copolymers (177.1950), or vinyl chloride-propylene copolymers (177.1980).

The only stabilizers that may be used are those listed under 175.300(3)(xxx), which I have checked on the attached copy of 21 CFR 178.2010 or prior sanctioned calcium-zinc-stannous stearate types. Some examples of these are Snyprons 221, 229, 266, 241; Mark QED, Ferro 7-V-1, 760X, 763, 5709, 5711, etc.

I have no information on the FDA acceptance status of SAS-30 or Drew L-39. I will contact the suppliers.

Please let me know if you have any questions.


W. C. Bachtel

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cc: B.K. Mikofalvy, ALTC