



113 EC J Plant
To note -

Law D partm nt
M memorandum

I am working with
Eng. Dept sector on
this issue - I should
February 12, 1986
not be a problem of any
significance to sector,
according to P. Hendry
B. Kuhn

J. B. CHARM
R. O. GHERGHEL
E. T. KUBU

JB Charn
Gulha - please
put with AHC -
EPA file for
-125-101

Re: FDA - PVC Proposal

Enclosed is proposed PVC regulations and commentary by Keller and Heckman. The sections relevant to our operations are found on Page 4184 of the FEDERAL REGISTER proposal dated February 3, 1986.

Item B, Col. 1, Page 4184, is directed to new regulation 21 CFR 177.1975 - Vinyl Chloride Polymer Resins, Rigid and Semi-rigid. The proposed regulation is found on Page 4187. This regulation provides for the safe use of rigid and semi-rigid PVC -- the operative limitation being that the finished food contact articles contain a residual VCM (RVCM) level not in excess of 10 ppb by weight of the PVC.

Item C, on Page 4184, and corresponding regulation 21 CFR 181.37 (Page 4188), provides for use of prior sanctioned PVC plasticized films, the operative limitation being that the RVCM content not exceed 5 ppb.

I talked to Keller and Heckman and they advised me that the plasticized material has a limitation of 5 ppb versus 10 ppb for the semi-rigid or rigid, because the agency feels that the 5 ppb is reasonably achievable by the industry for plasticized PVC and 10 ppb is reasonably achievable for the rigid and semi-rigid.

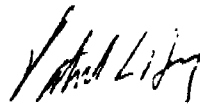
Rigid PVC is defined in ASTM D 883 as that having a modulus in excess of 100,000 psi and semi-rigid PVC has a modulus between 10,000 psi and 100,000 psi. Flexible or plasticized film would include anything below 10,000 psi.

I am advised by Dr. D. Dixler of Keller and Heckman that the calculation of residual monomer should be made against the total weight of the film, not merely the PVC component.

ASI-PR 0002581

If you have any reaction to the proposed regulations or Jerry Heckman's comments relative thereto, please advise me as soon as possible, so that we may make the March 4, 1986, deadline requested. In particular, do you have any comments on the proposed test for determining RVCM (see Item 4 of J. Heckman's letter)?

I am also enclosing for previous resins a copy of the letter from Keller and Heckman, which we have been using as a guideline to this point.



Patrick L. Henry

PLH:plb

Enclosures

CC: D. P. Burnham w/enc.
J. B. Oelkers " "
A. J. Stewart " "
H. W. Tenney " "

ASI-PR 0002582

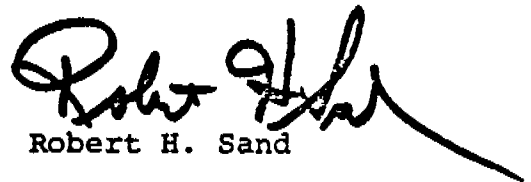
ALLIED CHEMICAL CORPORATION

LEGAL DEPARTMENT

January 31, 1974

MR. W. S. FERGUSON

With respect to the Department of Labor request on vinyl chloride, we might consider (1) what information we might have to offer; (2) whether this information might be coming in from other sources and (3) whether our financial interests in vinyl chloride warrant extensive direct involvement.


Robert H. Sand

ccs: Messrs. E. W. Callahan
E. M. Dixon
W. A. Knapp
J. M. Quinn✓

*Not labeled
by Allied
VII*

ASI-PR 0002583