

Rigid Vinyl Sheeting

Mr. G. T. Scriba
Law Department
Room 1901
30 East 42nd Street

February 26, 1958

Dr. W. B. Ackart
Mr. L. G. Howard
Mr. J. W. McLaughlin, Jr.

Andrew Jergens Company
VBA-9020 Natural

Dear Mr. Scriba:

In my letter of February eleventh regarding VBA-9020 Natural, I took into consideration the points you raised in your letter of February eighteenth.

It can be demonstrated that the components of this film are materials considered acceptable for food packaging applications based upon published reports. None of the components would be hazardous if it were transferred to the soap. I refer to increasing the oral toxicity of the soap rendering it more irritating or sensitizing. This statement is based upon judgment regarding the toxicity of the individual components as well as the quantities involved.

Very truly yours,

MEDICAL DIRECTOR

Thomas W. Hale, M. D.
jl

UCC
063644

Mr. J. W. McLaughlin, Jr.
292 Madison Ave.
10th Floor

February 18, 1958

LAW

Dr. W. B. Ackert - Bound Brook
Mr. I. G. Howard - Cincinnati
✓ Dr. T. W. Nale

Federal Food, Drug and Cosmetic Act
Andrew Jergens Company
VBA-9020 Natural

Dear Mr. McLaughlin:

I have your letter of February 10 and my copy of Dr. Nale's letter to Mr. Howard of February 11 regarding the above cast film which, I understand, is used in packaging solid soap. Soap as such is specifically excluded from the definition of a cosmetic in the Federal Food, Drug and Cosmetic law. However, the Federal Food and Drug Administration long ago took the position that "this exemption does not apply to shampoos, shaving creams, or to any other cosmetic except soap, even though the article under such nomenclature be essentially soap. A shampoo is a soap within the meaning of the exemption and the insertion of the word 'soap' in the name of the product will not entitle it to the exemption provided for soaps. If a soap bears representations which make it a drug (that is if its label makes therapeutic claims for it - GTS), it must conform to the drug provisions. TC-146, March 7, 1940".

Since we are dealing with the Jergens Company I would like to know more about the particular soap we are talking about. Is it simply ordinary soap? Is it a shampoo or a shaving cream or something else?

When we have this information I hope Dr. Nale will say whether there is a poisonous or deleterious substance in VBA-9020 Natural which might render the "soap" injurious to users under the conditions of use. We are concerned not only with oral toxicity (getting it in babies mouths), but more importantly with skin irritation and effect on eyes.

Very truly yours,


George T. Scriba

RECEIVED

FEB 19 1958

UCC

GTS:R

P.S. - I have gone off on a legalistic Food and Drug Act angle in this letter. We will be equally concerned with any hazards Dr. Nale reports, even if the Jergens product is soap and is exempt from the Act.

UCC
063645

BAKELITE COMPANY
DIVISION OF UNION CARBIDE CORPORATION

COPY

February 10, 1958

Mr. G. T. Scriba
Law Department
30 East 42 Street
Room 1901

Andrew Jergens Company

Dr. W. B. Ackert - BB
Mr. L. G. Howard - Cincinnati
Dr. T. W. Nale - 60 E /

Attached is the correspondence relating to the subject company and their evaluation of our cast film designated VTA-9020 Natural for use in packaging soap. Since I am not certain whether soap is considered in the cosmetic category, I am referring this entire matter to you for consideration and advice.

Your comments will be appreciated.

J. McIlers
att.

J. W. McLaughlin

UCC
063646

RECEIVED

FEB 13 1958

UCC
063646

Very truly yours,

Mr. L. G. Howard
Bakelite Company
2330 Victory Parkway
Cincinnati 6, Ohio

February 11, 1958

Dr. W. B. Ackart
Mr. G. G. Hissler
Mr. J. W. McLaughlin
Mr. T. R. Orme
Mr. G. T. Scriba
Mr. W. R. Smith
Dr. H. F. Sayth, Jr.
Mr. W. H. Tibbets

Andrew Jergens Company
VEA-9020 Natural

Dear Mr. Howard:

I would comment as follows on the proposed use of this cast film by Andrew Jergens Company to package cake soap in the manner you describe in your letter of February fourth to Mr. McLaughlin.

It would seem that there could be no objection to such use. In this instance we are not dealing with a food item but with a cake of soap. In general, VEA-9020 is very similar to our VEA-9023, which has been declared acceptable for food packaging use involving foods of low fat content.

Very truly yours,

MEDICAL DIRECTOR

Thomas W. Hale, M. D.

jl

J. W. McLaughlin
Bakelite Company
New York, New York

February 4, 1958

Cincinnati DSO

Dr. W. B. Ackart - B.B.

Andrew Jergens Company

Mr. O. G. Himmeler - B.B.

Dr. T. W. Hale - N.Y. ✓ (M.L.)

Mr. T. R. Orms - Chicago

Mr. G. T. Scriba - N.Y.

Mr. W. R. Smith - B.B.

Dr. H. F. Smythe - Mellon Institute

Mr. W. H. Tibbets - B.B.

VBA-9023

VBA-9020
Natural

This is in reply to your letter of January 27, 1958 regarding Andrew Jergens application in which detergents are to be packaged in our VBA-9020 Natural cast film.

It has now been determined that subject do not intend to package liquid detergents as was first reported, however, if their present package is accepted there is a possibility that it will be tried. As reported in recent correspondence, subject actually intends to package cakes of soap in a new skin tight package. Liquid soap, at 150°F, is pumped into a heat sealed bag of VBA-9020, and just prior to setting up into a solid the package is placed in a mold which forms the cake into a doughnut shape, leaving the middle section approximately 1/2" the thickness of the cake. The ability of the .002" film to be forced and retain its shape results in an ideal skin tight package.

To date, we have not been concerned with toxicity, however, this point will be covered by letter if you think it is advisable. Our preliminary studies have been confined to selecting the best possible film for the application.

Since the product to be packaged will be cake soap, do you foresee any problems with toxicity? I believe we are on safe ground. Incidentally, the above is confidential and explains, in part, why we were not given all the facts during the initial stages.

Very truly yours,

L. G. Howard

LGH:jaw

RECEIVED

FEB 6 1958

INDUSTRIAL CHEMISTRY &
TOXICOLOGY DEPARTMENT

UCC

063648