

(See Plasticizer DOP)

Mr. H. F. Robertson
Bakelite Company
Room 1103
30 East 42nd Street

May 13, 1957

Mr. W. J. Frissell
Mr. W. F. Hemperly
Mr. G. G. Himmeler
Mr. J. A. Pomeroy
Mr. R. S. Hallas
Mr. L. H. Peters

Acceptability of DOP
Plasticized Film for
Packaging Wieners

Dear Mr. Robertson:

Attached is a copy of a letter I wrote to Mr. Knowles and others on this subject on July 16, 1956.

In Dr. Lehman's latest article on Food Packaging, dated October, 1956, he still limits the use of DOP in food packaging to foods of high water content only.

Wieners, being of high fat content, would be in a similar class with bacon. Dr. Lehman always objected to the use of DOP in packaging for these highly fatty meats. Mr. Mehurin depends upon Dr. Lehman for such advice and Mr. Mehurin's reply to the customer is what we would expect.

Very truly yours,

MEDICAL DIRECTOR

Thomas W. Hale, M. D.
rs
attachment

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Mr. J. B. Knowles
Bakelite Company
New York

July 16, 1956

Mr. A. J. Dragonette/
Mr. D. C. Kay
Mr. W. F. Hemperly
Mr. O. G. Himmeler
Mr. V. J. Houska
Mr. L. M. Peters
Mr. J. P. Raycob

Request for Product Transfer
Dated 5/29/56 - VBA-9020

Dear Mr. Knowles:

I would comment on Mr. Himmeler's letter of July ninth to you, relative to the use of DOP in food packaging formulations. As far as I know, the Food and Drug Administration has not changed its attitude regarding the use of DOP in films for packaging fatty foods. Mr. Himmeler refers only to foods which are 100 per cent fatty (butter, oleo, and lard).

The following is quoted from an article published by Dr. A. J. Lehman, Chief Pharmacologist of the Food and Drug Administration:

"Films prepared with this plasticizer (di-2-ethylhexyl phthalate) are suitable for wrapping foods with a high water content such as fresh fruits and vegetables, but not suitable for wrapping bacon, lard, oleomargarine, butter or any other food with a high fat content."

There would be no objection to the use of DOP in the other specific applications listed by Mr. Himmeler. We had many conferences with officials of the Food and Drug Administration before DOP was finally accepted for certain uses. Acceptance was based upon our own toxicological data and extraction studies done by the Chemicals Company in Charleston. In these studies specific foods were actually packed in films containing DOP.

Very truly yours,

MEDICAL DIRECTOR

Thomas F. Dale, M. D.

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FOR INTERNAL CORRESPONDENCE

BAKELITE COMPANY

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30 EAST 42nd STREET, NEW YORK 17, NEW YORK

To (Name)	Dr. T. W. Hale	Date	May 10, 1957
Company	Industrial Medicine and	Originating Dept.	Research
Location	Toxicology Department	Answering letter date	
	60 East 42nd St. - Room 920		
Copy to	Mr. W. J. Frissell	Subject	Acceptability of DOP Plasticized
	Mr. W. F. Hemperly		<u>Film for Packaging Wieners</u>
	Mr. G. G. Himmeler		
	Mr. J. A. Pomeroy		
	Mr. R. S. Hallas		
	Mr. L. E. Peters		

Dear Dr. Hale:

We are attaching a copy of a letter recently received from Mr. Peters of the Film and Sheeting Division of the Bound Brook laboratory which is self-explanatory.

We would assume that the discrepancy in the beliefs of those at Bound Brook with Mr. Mehurin could be due to interpreting the phrase "100% fatty foods". We do know that Food and Drug accept DOP plasticized films for packaging dry materials but there may be some area of disagreement with respect to meats because of the fact that certain portions of the meat could be considered to be 100% fatty and might extract excessive amounts of plasticizer in certain limited areas of contact.

We would be glad to have any comments you would care to give us in clarification.

Yours very truly,



H. S. Robertson:MMH
Att.

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INDUSTRIAL MEDICINE &
TOXICOLOGY DEPARTMENTUCC
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FOR INTERNAL CORRESPONDENCE

BAKELITE COMPANY

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RIVER ROAD, BOUND BROOK, NEW JERSEY

To (Name) Mr. H. F. Robertson
Company Bakelite Company
Location New York, New York

Date May 7, 1957
Originating Dept. S17-95 (Film & Sheet Div.)
Answering letter date

Copy to Mr. W.J. Friessell - BB
Mr. W.F. Hemperly - BB
Mr. G.G. Himmeler - BB
Mr. J.A. Pomeroy - 9 E. 41st
Mr. R.S. Hallas - 9 E. 41st

Subject Non-Toxicity of "Flexol"
DOP Plasticizer

File: 1.30

The approval of "Flexol" DOP plasticizer by FD & A as an ingredient for use in flexible vinyl packaging films was granted some time ago. At Bound Brook, this approval was understood to mean that DOP plasticized films could be used for packaging all but 100% fatty foods, such as, butter, lard or margarine. On the basis of this approval, various Krene cast vinyl film products containing DOP plasticizer and acceptable stabilizer systems have been recommended for food usage.

A very recent occurrence, in the form of a Report of Call by Mr. J. W. Ninton on the W. S. Cloud Machine Company of Chicago dated April 22, 1957 has, however, puzzled us. For your convenience, the pertinent part of the letter is quoted below.

"Subject is also very interested in obtaining a cast vinyl film for packaging wieners. Pliofilm had previously been used for this application, but it is found that its barrier properties are too good and that moisture and sliming result on the wieners. They feel that the cast vinyl film has high enough H.V.T. and oxygen transmission to be a satisfactory film. Physical properties comparable to our VBA-9925 are felt by Chuck Cloud to be the proper level.

We had previously discussed our VBA-9923 (Non-toxic VBA-9925) with subject for test application and they have written the U.S. Department of Agriculture, Agricultural Research Service, Meat Inspection Bureau, concerning this film. They received an answer from Mr. E. M. Mehurin, Chief of the Chemical Control Section of the Meat Inspection Bureau, who informs them concerning our VBA-9923 "the plastic material is unacceptable to this office for packaging meat and meat food products prepared under our supervision because of the presence of an unsuitable plasticizer." They go on to say "if the supplier wishes to substitute one of the acceptable plasticizers for the one now being used in the VBA-9923 material being furnished you, the plastic material will then be suitable for packaging product prepared in Federally inspected meat packing establishments."

BAKELITE COMPANY
A DIVISION OF UNION CARBIDE & CARBON CORPORATION
BOUND BROOK, N. J.

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T : H. F. Robertson

May 7, 1957

Since it would seem that Mr. Mehurin has chosen to differ with previous rulings on the DOP toxicity subject it would be appreciated if a clarification of this problem could be quickly obtained. While the particular application in question may not suffer with an adverse ruling such as now exists, it would be well to have the point clarified for future usage.

LHP/adh

L. H. Peters

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(CR DOP Plasticizer)

Mr. J. B. Knowles
Bakelite Company
New York

July 16, 1956

Mr. A. J. Dragonette/
Mr. D. C. Kay
Mr. W. F. Hemperly
Mr. G. G. Himmler
Mr. V. J. Houska
Mr. L. H. Peters
Mr. J. P. Raycob

Request for Product Transfer
Dated 5/29/56 - VBA-9020

Dear Mr. Knowles:

I would comment on Mr. Himmler's letter of July ninth to you, relative to the use of DOP in food packaging formulations. As far as I know, the Food and Drug Administration has not changed its attitude regarding the use of DOP in films for packaging fatty foods. Mr. Himmler refers only to foods which are 100 per cent fatty (butter, oleo, and lard).

The following is quoted from an article published by Dr. A. J. Lehman, Chief Pharmacologist of the Food and Drug Administration:

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There would be no objection to the use of DOP in the other specific applications listed by Mr. Himmler. We had many conferences with officials of the Food and Drug Administration before DOP was finally accepted for certain uses. Acceptance was based upon our own toxicological data and extraction studies done by the Chemicals Company in Charleston. In these studies specific foods were actually packed in films containing DOP.

Very truly yours,

MEDICAL DIRECTOR

Thomas W. Hal , M. D.

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FOR INTERNAL CORRESPONDENCE
BAKELITE COMPANY



RIVER ROAD, BOUND BROOK, NEW JERSEY

To (Name) **Mr. J. B. Knowles - 292 Madison**
 Company **Bakelite Company**
 Location **New York, N. Y.**

Date **July 9, 1956**

Originating Dept. **817-95 (Film & Sheeting Division)**

Answering letter date

Copy to **Mr. A. J. Dragonette /**
D. C. Kay - 9 E. 41st
Mr. W. F. Hemperly - BB
Mr. V. J. Houska - BB
Dr. T. W. Nale - 300 Madison
Mr. L. H. Peters - BB
Mr. J. Paul Raycob - 292 Madison

Subject **Request for Product Transfer**
Dated 5/29/56 - VB..-8020.

File: **2.12**

Dear Mr. Knowles:

In subject Request for Transfer we stated that The ingredients in the formulation are FDA approved, however, the presence of DOP limits food contact to non-fatty foods . You have raised some questions about the accuracy of this statement so we have checked into the matter and find that we were not entirely correct. In his June 28, 1950 letter to all C&CCC Technical Representatives, Mr. H. D. Hughes stated:

You were advised in our announcement of April 21 on the subject of 'Toxicity of DOP' that consultations on the use of DOP in food wrap films were being held with the Food & Drug Administration. On June 23 the Food & Drug Administration sanctioned the use of DOP in a number of applications through their customary method of saying 'We have no objection to the use of DOP in... '.

The Food & Drug Administration had no objection to the use of DOP in vinyl compounds destined for the following uses:

Wrap for prepackaged steak, etc.	Intravenous tubing
Wrap for vegetables	Cap liner stock coating
Frozen food package wraps	Coatings for food conveyor belts
Water and ice bags	Film wrap for cheese
Milk and beer tubing	

The only variety of potential food wrap end uses for which the Food & Drug Administration sanction was sought which require further consideration are those uses where the DOP carrying film would be in contact with 100% fatty foods (butter, oleo and lard).

Further than this the Food & Drug Administration expressed in a general way no objection to DOP use in vinyl compounds that come in prolonged contact with 'watery products' or in casual contact with completely fatty products.

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BAKELITE COMPANY
A DIVISION OF UNION CARBIDE AND CARBON CORPORATION
BOUND BROOK, N. J.

- 2 -

July 9, 1956

Mr. J. B. Knowles - 292 Madison
Bakelite Company
New York

Subject: Request for Product
Transfer Dated 5/29/56 - VBA-9026

The above sheds a different interpretation on the matter than that which we offered. On the basis of this, films containing DOP are apparently acceptable in almost all food packaging applications except those where the article is 100% fatty.

Our interpretations must be considered very general in nature and, as in the past, specific cases regarding toxicity should receive the review of the Medical Department.

Very truly yours,


G. G. Himmler.

GGH:vlk

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INDUSTRIAL MEDICAL &
TOXICOLOGY DEPARTMENT