

October 16, 1991

Dave Polenda

SUBJECT: E-10 (BASED ON GEON 121X10)

As we discussed on 10/10/91, the proposed recipe (attached) for E-10 (based on Geon 121X10) would meet the guidelines stated in my letter of 6/21/91. However, since it cannot meet the current Good Manufacturing Practice (GMP) maximum volatility requirement of 3.0%, it does not meet the requirements necessary to claim prior sanctioned status. Still, resins made with this recipe would be acceptable under 177.2600, since the DOA level is well within the 30% limit for this ingredient.


Bob Hinderer

1016-7/jp

*Once Geon assigns a
number to the E-10
then send us the recipe
and we will evaluate*

21804001

BFG16570

DR. ROBERT HINDERER

10/10/91

The E-10 recipe:

PROPOSED RECIPEMA RUNphm

100	Vinyl Chloride	Ps 100	(6611)
1.5	Witco 4151	177,2600	1.1 (soap, surfactant)
0.70	L/S Alcohol	0.65	blend of lauryl, myristyl, cetyl, stearyl alcohols (GRW 33N is suppliers name for material) (BFG code 710075)
	175.300		
0.40	di-octyl adipate	✓ 0.3	part of soap system
0.20	Carbowax 600	✓ 0.1	polyethylene glycol-600 molecular weight, peg 600, anti-stat
0.30	Drew L-140	177,2600	0.0 defoamer
0.046	EHP	0.046	di - 2 - e t h y l h e x y l peroxydicarbonate, (BFG code G135)(initiator) (CAS No. 16111-62-9)
0.05	ACPND	0.05	alpha-cumyl-peroxyneodecanoate, (BFG code G52)(initiator)
0.04	IBP	0.04	diisobutryl peroxide (initiator) (no BFG code yet, TSCA approved) (CAS 3437-84-1)
3.236	TOTAL	2.246	

The PROPOSED recipe levels are what the plant has tentatively agreed to. The actual recipe we ran (MA) had less extractibles. Since we only ran 100,000# the plant wanted to maintain some flexibility in the recipe in case there was some polymerization instability.

Connie Dillon asked whether I could agree to an IV and an extractibles specification. I can agree to the IV part easily since we will be at 1.35. I can't do so with the extracts. Our plant data for 6 hours cold methanol says we bounce from 2.7 to 3.3% extracts based on the recipe. They recently went from 1.1 back to 1.5phm soap. At the lower levels we were usually under 3% extracts. At the higher levels we were over 3% extracts. Since the plant has made so little of this new product and they have been forced to alter their 121x10 recipe to meet B&D's property requirements they were reluctant to agree to lower soap system levels. That's why we proposed the higher levels. What are our options?



E10_FDA_RECIPE

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