UNION CARBIDE CORPORATION
270 PARK AVENUE
NEW YORK, N. Y. 10017

LAW DEPARTMENT

October 31, 1963

Food and Drug Administration
Washington 25, D.C.

Re: Asbestos Fiber

Gentlemen:

(1) This is to inquire whether you are in agreement with us that the use of asbestos fiber as an integral component of paper and paperboard does not result, and may not reasonably be expected to result, directly or indirectly, in its becoming a component or otherwise affecting the characteristics of the food when the paper or paperboard is employed in contact with food.

(2) If not, whether you are in agreement with us that this use of asbestos fiber is generally recognized as safe among experts qualified by scientific training and experience to evaluate its safety.

(3) If not, we ask you to file this letter as a petition for a regulation under Section 409 of the Federal Food, Drug and Cosmetic Act stating that this use of asbestos fiber is safe. We propose to sell asbestos fiber for this use. Responsible paper manufacturers tell us that it improves the quality of paper and paperboard for certain food contact use. We base this petition on the generally known physical characteristics of asbestos fiber. While we write in terms of "asbestos fiber" without limitation in view of your presumed interest in a broad regulation, our company's direct present interest lies in chrysotile asbestos (a magnesium silicate). We attach a table entitled "Solubility and Dissociation Data for Chrysotile in Water" from The Journal of Physical Chemistry, Vol. LX (1956) page 1220, and our summary of "Properties of Chrysotile Asbestos Fiber". We respectfully propose the following regulation:

¶121.__ Asbestos Fiber.

Asbestos fiber may be safely used as a component of paper and paperboard intended for use in producing, manufacturing, packing, processing, preparing, treating, packaging, transporting, or holding food.

Very truly yours,
UNION CARBIDE CORPORATION

By_____
George T. Scriba

GTS:R
enc.

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