

AKELITE COMPANY
A DIVISION OF UNION CARBIDE AND CARBON CORPORATION

Dr. T. W. Hale - File COPY

De la...
Mr. R. F. Clash
Mr. G. G. Hinder
Mr. J. A. Pomeroy
Mr. J. P. Raycob/
H. L. Burpo
Mr. H. F. Robertson (2)
File: 8.0131

June 13, 1957

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JUN 14 1957
TOXICOLOGY

Mr. Donald G. Lundgren
Syracuse University Research Institute
Microbiological and Biochemical Research Center
1075 Comstock Avenue
Collendale Campus
Syracuse 10, New York

Dear Mr. Lundgren:

Thank you for your letter of June 3 bringing to our attention the recent action of the FDA in removing FD&C Yellow No. 3 from the approved list. Our Toxicological Department had also brought this action to our attention so we are already in the process of replacing the Yellow No. 3 with a suitable substitute.

Mr. J. A. Pomeroy is now handling rigid vinyl in our department so I have referred your letter to him. We will probably contact you when the substitution of another colorant has been completed.

Thank you again for bringing this matter to our attention.

Very truly yours,

ORIGINAL SIGNED BY

D. C. KAY

D. C. Kay

New Product Engineering Department

DKK:MK

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JUN 17 1957

INDUSTRIAL MEDICINE &
TOXICOLOGY DEPARTMENT

UNIVERSITY RESEARCH INSTITUTE SYRACUSE

PHYSIOLOGICAL AND BIOCHEMICAL RESEARCH CENTER - 1075 COLLEGE AVE. SYRACUSE, N.Y.

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March 21, 1957

D. C. KAY

Mr. D. C. Kay
New Product Engineering Dept.
Bakelite Company
30 East 42nd Street
New York 17, New York

Dear Mr. Kay:

This will acknowledge your letter of March 20 supplying us with the necessary answers for our questions posed in previous correspondence. The material supplied was adequate for us to make an adjudication and we have notified Mr. Earl Foster of the Sea-Right Company that, in our opinion, this product, VCAD-3420-Ivory 125, is suitable for their proposed operation.

Many thanks for your immediate attention to our inquiry.

Sincerely yours,

Donald G. Lundgren

DGL:dj

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cc: G.O.Himmler/L.G.Krauskopf-BB
H.L.Burpo/J.P.Raycob-Clifton
H.P.Robertson/Dr.T.W.Nale - NY
W.J.Canavan/Dr.R.F.Clash,Jr.-NY
J.W.McLaughlin-NY
A.J.Dragonette-NY

March 20, 1957

AIR MAIL - SPECIAL DELIVERY

Dr. Donald G. Lundgren
Microbiological & Biochemical Research Center
1075 Constock Avenue
Syracuse 10, New York

Dear Dr. Lundgren:

Probably several of the questions you ask in your letter of March 15th were raised by an inaccuracy in my previous letter to you of December 18, 1956. In that letter I referred to the rigid vinyl sheeting which had proved acceptable to the F.D.A. as VCA-3400 and VCA-3420; the designation should have been VCAB-3400 and VCAB-3420. Perhaps the following comments, in the same order as the questions in your letter of March 15th, will help answer the questions:

1. Your designation VA-3400 Ivory 125 probably should read VCA-3400 Ivory 125 - all of our calendered rigid vinyls will have a "C" as the second letter to indicate "calendered". We use a h-letter prefix before the compound number to indicate a compound under the supervision of our Development Department. When the compound is transferred to the responsibility of the Manufacturing Department, the fourth letter is dropped to indicate this transferral. Thus VCAA or VCAB or VCAC becomes merely VCA when transferred. In my letter of December 18, 1956, I was anticipating this transferral which still has not occurred. The fourth letter in the development designation is a serial letter indicating minor modifications of the base compound which began as VCAA. If a change was at all significant, it would require a change in base number and not just a letter change.

The formulation for VCAB-3400 Ivory 125 Std (IV stands for Ivory and Std for "standard surface") was the one submitted to the F.D.A. and the one which they found acceptable.

2. The VCAB-3420 Ivory 125 Std was the formulation submitted to the F.D.A. and the one which they found acceptable.

3. We had not been aware of the announcement in the Federal Register that FD & C Yellow No. 3 was being considered for removal from the list of certified dyes. We know the FD&C Yellow No. 1 is being considered for delisting and have already switched to other colorants where possible, but

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INDUSTRIAL MEDICINE &
TOXICOLOGY DEPARTMENT

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BAKELITE COMPANY
A DIVISION OF UNION CARBIDE AND CARBON CORPORATION

Dr. Donald G. Lundgren

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March 20, 1957

if the FD&C Yellow No. 3 is also being considered for delisting, we shall immediately look for a substitute yellow which is in good standing in anticipation of a final unfavorable report on the No. 3. This we would probably wish to do even if the No. 3 is not finally delisted if there is any question about its being acceptable.

4. We know of no significant chemical changes which would occur when either of the formulations discussed above are merely dissolved in solvents and applied as coatings.

For your consideration the formulations of the various 3400 and 3420 modifications are given below. We request that you keep this information confidential other than in your relationships with Sealright.

Our latest recommended food packaging grade rigid vinyl sheeting is VCAD-3420. The formulation is:

VCAD-3420

VINS	97.05 - 87.05
VIHH	0.00 - 10.00
C-2 (calcium ethyl acetoacetate)	1.00
Zinc stearate	.10
Paraplex G-62	.60
Calcium Stearate	1.25
	<u>100.00</u>

The colorants used to produce the Ivory 125 color are:

FD&C Yellow No. 3	0.006%
Titanium Dioxide-NF Grade	5.0 %

This VCAD-3420 has superseded VCAB-3420, which had the formulation:

VCAB-3420

VINS	96.90
C-2	1.00
Calcium Stearate	1.50
Zinc Stearate	0.10
G-62	0.50
	<u>100.00</u>

We do not plan to produce any more material in the 3400 series, but for completeness the formulations are:

VCAC-3400

VINS	95.85
Magnesium epoxy- stearate	2.50
C-2	1.50
Zinc Stearate	.15
	<u>100.00</u>

VCAB-3400

VINS	96.80
Magnesium epoxy- stearate	3.00
Zinc Stearate	.20
	<u>100.00</u>

~~the~~ from / 7 W Gale
1957

I have one the letters from Lundgren regarding, bearing it which prompted my letter of the 20th - of which you got a copy. Speed was of the same kind. Deabright was just sitting tight waiting.

Dane 10-7

BAKELITE COMPANY
A DIVISION OF UNION CARBIDE AND CARBON CORPORATION

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Dr. Donald G. Lundgren

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March 20, 1957

All of the ingredients listed in the formulation for the VCAD-3420 you will find listed as acceptable in the lists published by the F.D.A. covering the ingredients which may be used in plastics which come into contact with foods.

We hope that the above information will provide you with the data necessary in your consideration of the suitability of these materials for the intended purpose. Should you desire any other information, don't hesitate to call on us.

Very truly yours,

David C. Kay
NEW PRODUCT ENGINEERING DEPT.

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SYRACUSE UNIVERSITY RESEARCH INSTITUTE

SYRACUSE 10 NEW YORK

MICROBIOLOGICAL AND BIOCHEMICAL RESEARCH CENTER - 1075 Comstock Avenue, Collenda Campus

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MAR 21 1957

D. C. KAY

March 19, 1957

Mr. D. C. Kay
New Product Engineering Dept.
Bakelite Company
30 East 42nd Street
New York 17, New York

Dear Mr. Kay:

Please refer to my letter of March 15 pertaining to information about two of your plastic coating materials, plus comments as regards FD & C Yellow No. 3 and your views concerned with the possible change in chemical formulation when VA-3400-Ivory 125 was reworked as a coating material.

I would like to extend this inquiry and to request this information of your coating VCAP-3420-Ivory 125. Has Food and Drug approved this material for use as a plastic coating for food containers? Further, I would appreciate your opinion as to the likelihood of any chemical changes occurring in this formulation from a redissolving of the molded plastic and mixing this stock with new material.

The Sealright people have expressed an urgency to this matter and your immediate attention would be appreciated.

Sincerely yours,

DGL:dj

Donald G. Lundgren
for Ernest Reed, Director
Microbiological & Biochemical
Research Center

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SYRACUSE UNIVERSITY RESEARCH INSTITUTE SYRACUSE 10, N.Y.

MICROBIOLOGICAL AND BIOCHEMICAL RESEARCH CENTER - 1075 Comstock Avenue, Cottenale Camp

March 15, 1957

Mr. D. C. Kay
New Product Engineering Dept.
Bakelite Company
30 East 42nd Street
New York 17, New York

Dear Mr. Kay:

We have been in contact with Mr. Foster, Sealright Company, Fulton, New York, at his request, regarding the use of Bakelite plastics for some of their applications. A number of questions were brought up and I'm turning to you for help in clarifying the situation.

1. Is material VCAB-3400-IV-125 Std the same as VA-3400-Ivory 125?
2. Is material VCAB-3420-IV-125 Std the same as VCA-3420 currently having favorable status with FDA?
3. Are you aware of the announcement in Federal Register relative to FD&C Yellow #3, which you are now using, as regards its possible removal from the "certified dyes" list? Are you contemplating a substitution for the Yellow #3 color?
4. What are your views as regards possible chemical changes occurring when molded resin (VA-3400-Ivory 125) is redissolved in solvents and remolded. It has been called to our attention that some chemical modification may occur as a result of the initial operation. Since you are much closer to the chemistry of the material, I would appreciate your views on the matter.

Your early attention to this matter would be much appreciated.

Sincerely yours,

Donald G. Lundgren
for Ernest Reed, Director
Microbiological & Biochemical
Research Center

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