



September 23, 1992

Food and Drug Administration  
Washington DC 20204

Mr. Steven P. Collins  
Vice President Company  
ZRC Products, Company  
21 Newport Ave.  
Quincy, Massachusetts 02171-9975

Dear Mr. Collins:

This is in response to your letter and attachments of August 27, 1992, in which you requested that we re-evaluate the formulation of your ZRC Cold Galvanizing Compound for use as a coating on bulk reusable containers intended for handling, storing, and transporting food, including potable water. You have stated, and we note that your product was previously evaluated by FDA in 1976 and 1987 and found to be in compliance with 21 CFR 175.390.

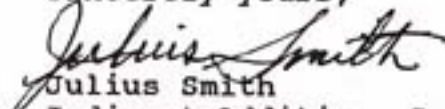
Your current submission proposes to add an aluminum paste, (ZRC Galvilite) to your ZRC Cold Galvanizing Compound formulation to brighten the color of the product to an acceptable shade. You request that we re-evaluate ZRC cold Galvanizing Compound containing the aluminum paste. The MSDA indicates that ZRC Galvilite consist of aluminum flakes and stoddard solvent (toluene, xylene, ethylbenene, etc).

It should be noted that aluminum is generally recognized as safe (GRAS) and that stoddard solvent, due to its high volatility, is expected to be lost during manufacture of the product and we would not expect this ingredient to become a component of food.

Based on our review of the submitted data and the above comments, we find that with the addition of aluminum paste, the components of your product continue to be in compliance with 21 CFR 175.390.

If we can be of further assistance, please do not hesitate to contact us.

Sincerely yours,



Julius Smith

Indirect Additives Branch, HFF-335  
Division of Food and Color Additives  
Center for Food Safety  
and Applied Nutrition