



## Memorandum

Date Aug. 17, 1983

From Food Additive Chemistry Evaluation Branch, HFF-458

Subject FAP 3B3700 - Ciba Geigy Corp. Consumption Estimate.

To Petitions Control Branch, HFF-334  
Attn: J. Herrman, Ph.D.

In DCH's previous memo, dated 7-7-83, DT was asked to comment on a concentration in the daily diet of 0.018 ppm. This number was derived using the heptane migration value divided by five. However, in our first memo, 2-10-83, we stated that a two hour heptane extraction at 120 F would only support use at temperatures higher than room temperature if the heptane results were not divided by five. Therefore, strictly speaking, a concentration in the daily diet of 0.018 ppm would only be appropriate when use with fatty foods is limited to room temperature. The proposed regulation, however, specifies condition of Use C through H (176.170, table 2). For use at such temperatures, the concentration in the daily diet is more correctly calculated to be 0.067 ppm and the EDI 0.20 mg/day. Because heptane is such an aggressive solvent relative to real foods, the value of 0.067 ppm is certainly conservative.

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HFF-400; 450; 156  
HFF-458 RF/Flood  
MTFlood:lsl 8-16-83  
RD Init:PSSchwartz:JWHoward