



# GUARDIAN SYSTEMS, INC.

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August 11, 2005

Mr. John Anspach  
Induron Coatings, Inc.  
P.O. Box 2371  
Birmingham, Alabama 35201

Subject: Code of Federal Regulations

Dear Mr. Anspach,

Guardian Systems, Inc. performed a Water Extractability Test on Protecto 401 Ceramic Epoxy coating provided by Induron Coatings, Inc. The coating was applied to glass plates and cured for one week. The test was run per exposure conditions 4(v) simulating room temperature filling and storage. The plates were placed in D.I. water for twenty-four hours at 120°F. The water was evaporated and the residue weighed to the nearest 0.1 milligram.

The calculated result of 7.0mg/L was less than 50mg/L (ppm), which is the reference point for doing extended analysis to determine chloroform-soluble extractives. The water extractable results of 0.30mg/sqin is well below the reference of 18mg/in<sup>2</sup> for a coating intended for repeat use.

Attached are copies of the Code of Federal Regulations Volume 21 Part 175.300 to use as reference material.

If you have further questions, please contact me at (205) 699-6647.

Sincerely,



Jerry Horncastle  
Laboratory Manager

characterizing the type of food, and under conditions of time and temperature characterizing the conditions of its intended use as determined from tables 1 and 2 of paragraph (d) of this section, shall yield chloroform-soluble extractives, corrected for zinc extractives as zinc oleate, not to exceed the following:

(1) From a coating intended for or employed as a component of a container not to exceed 1 gallon and intended for one-time use, not to exceed 0.5 milligram per square inch nor to exceed that amount as milligrams per square inch that would equal 0.005 percent of the water capacity of the container, in milligrams, divided by the area of the food-contact surface of the container in square inches. From a fabricated container conforming with the description in this paragraph (c)(1), the extractives shall not exceed 0.5 milligram per square inch of food-contact surface nor exceed 50 parts per million of the water capacity of the container as determined by the methods provided in paragraph (e) of this section.

(2) From a coating intended for or employed as a component of a container having a capacity in excess of 1 gallon and intended for one-time use, not to exceed 1.8 milligrams per square inch nor to exceed that amount as milligrams per square inch that would equal 0.005 percent of the water capacity of the container in milligrams, divided by the area of the food-contact surface of the container in square inches.

(3) From a coating intended for or employed as a component of a container for repeated use, not to exceed 18 milligrams per square inch nor to exceed that amount as milligrams per square inch that would equal 0.005 percent of the water capacity of the container in milligrams, divided by the area of the food-contact surface of the container in square inches.

\* (4) From coating intended for repeated use, and employed other than as a component of a container, not to exceed 18 milligrams per square inch of coated surface.

(d) Tables:

Table 1 Types of Food

- I. Nonacid (pH above 5.0), aqueous products; may contain salt or sugar or both, and including oil-in-water emulsions of low- or high-fat content.
- II. Acidic (pH 5.0 or below), aqueous products; may contain salt or sugar or both, and including oil-in-water emulsions of low- or high-fat content.
- III. Aqueous, acid or nonacid products containing free oil or fat; may contain salt, and including water-in-oil emulsions of low- or high-fat content.
- IV. Dairy products and modifications:
  - A. Water-in-oil emulsion, high- or low-fat.
  - B. Oil-in-water emulsion, high- or low-fat.
- V. Low moisture fats and oils.
- VI. Beverages:
  - A. Containing alcohol.
  - B. Nonalcoholic.
- VII. Bakery products.
- VIII. Dry solids (no end test required).