

USDA AND FDA APPROVED

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service



Food and Drug Administration
Washington DC 20204

JUN 4 1986

Mr. Tom Heiss
Advanced Protective Products, Inc.
187 Warren Street
Jersey City, New Jersey 07302

Dear Mr. Heiss:

This replies to your letter of May 12 concerning your Rust Destroyer solvent base primer.

If the primer is covered by a top coat, as you indicate, and the top coat acts as a functional barrier so that there will be no migration of components of the primer to food, then the components of the primer will not be considered food additives as that term is defined in section 201(s) of the act.

Sincerely yours,

Pat T. Adamo
Assistant to the Director
Division of Regulatory Guidance
Center for Food Safety
and Applied Nutrition