



JUL - 3 1991

Food and Drug Administration
Washington DC 20204

Mr. Russell W. Kirchner III
High Performance Alloys, Inc.
555 Dearborn Street
Tipton, IN 46072

Dear Mr. Kirchner:

This responds to your letter received in our office on February 11, 1991, requesting our opinion on the use of your cobalt alloy to produce machine parts for food processing equipment which may come in contact with food. You indicated that your alloy is 49.6 to 56.1 percent cobalt, 28 to 32 percent chromium, 3.5 to 5.5 percent tungsten, 3 percent nickel, 3 percent iron, 2 percent manganese, 2 percent silicon, 1.5 percent molybdenum, and 0.9 to 1.4 percent carbon.

After reviewing the information you provided, we find that your cobalt alloy is expected to be resistant to corrosion and abrasion, and its components will not migrate significantly to food. Further, in the past, we have stated that we do not object to the use of cobalt alloys in food processing equipment. We find no reason to alter this opinion, based on the information you have provided. Therefore, we have no objection to the use of your cobalt alloy in food-contact processing equipment.

If I can assist you further, please let me know.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Alan M. Rulis", written over a horizontal line.

Alan M. Rulis, Ph.D.

Director

Division of Food and Color Additives
Center for Food Safety and
Applied Nutrition