



Potlatch Corporation
Idaho Pulp and Paperboard
803 Mill Road
Lewiston, Idaho 83501

June 8, 2005

Buzz Converting
533 San Juan Ave
Stockton, CA 95203

Dear Mr. Jeff Van den Boom :

We received your request for a Material Safety Data Sheet for Potlatch paperboard. Our mill has neither created nor issued a Material Safety Data Sheet because our products do not require MSDS sheets for the following reasons according to Title 29 Part 1910, Section 1200 of the CFR:

1) This section applies to *"...chemical manufacturers or importers to assess the hazards of chemicals which they produce or import, and all employers to provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training."*

2) This section does not apply to articles which *"means a manufactured item: (i) Which is formed to a specific shape or design during manufacture; (ii) which has end use function(s) dependent in whole or in part upon its shape or design during end use; and (iii) which does not release, or otherwise result in exposure to, a hazardous chemical, under normal conditions of use."*

Our paperboard products are considered to be articles and are not considered to be chemicals as defined by this legislation.

However, Potlatch does provide an FDA compliance letter addressing the suitability of using our paperboard products for food contact end-uses. A copy of our FDA compliance letter is attached.

We hope this information is helpful.

Sincerely,

A handwritten signature in cursive script that reads "Nick Chance".

Nick Chance
Customer Service Leader



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Dear Mr. Jeff Van den Boom:

We have received your request for assurance that Potlatch paperboard complies with FDA requirements. The following statement applies to board produced at both the Cypress Bend, Arkansas, and Lewiston, Idaho, paperboard mills. Potlatch makes the following guaranty in accordance with section 303 (c)(2) of the Federal Food, Drug and Cosmetic Act (21 U.S.C. Section 333 (c)(2) and 21 Code of Federal Regulations section 7.13 (b)(2):

The article comprising each shipment or other delivery hereafter made by Potlatch Corporation to, or on the order of, **Buzz Converting**, is hereby guaranteed, as of the date of such shipment or delivery, to be neither adulterated nor misbranded within the meaning of the Federal Food, Drug and Cosmetic Act ("FDCA"), nor an article which may not, under the provisions of Sections 404, 505 and 512 of the FDCA (21 U.S.C. Sections 344, 355 and 360b) be introduced into interstate commerce.

All Potlatch food-packaging paperboard, as shipped from the mill, is in compliance with the FDCA as amended, and all applicable food additive regulations. In particular, these paperboards comply with 21 Code of Federal Regulations sections 176.170, 176.180, 176.260, and 109.30a(9).

The area of colorants in food-packaging paperboard is not presently covered by regulation. Our food-packaging paperboard does comply with the current FDA position regarding colorants as documented in the July 31, 1979 letter from Joseph P. Hile, Associate Commissioner for Regulatory Affairs of FDA, to Dr. R. C. Calkins, The American Paper Institute (now known as the American Forest & Paper Association).

The tests used in determining the extraction levels were run with water and N-heptane. Attached for your information is a copy of the tables listing the types of food and conditions of use for the various extraction conditions. For the extraction conditions of our paperboard, the conditions of use A, B, C, D, E, F, G and H apply, for nonalcoholic foods and beverages.

Sincerely,

Nick Chance
Customer Service Leader

Attachments (2)

Revision 1/29/01

(c) The food-contact surface of the paper and paperboard in the finished form in which it is to contact food, when extracted with the solvent or solvents 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 this paragraph, shall yield net chloroform-soluble extractives (corrected for wax, petrolatum, mineral oil and zinc extractives as zinc oleate) not to exceed 0.5 milligram per square inch of food-contact surface as determined by the methods described in paragraph (d) of this section.

Table 1-Types of Raw and Processed Foods

- I. Nonacid, aqueous products; may contain salt or sugar or both (pH above 5.0).
- II. Acid, 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 emulsions, high- or low-fat.
 - B. Oil-in-water emulsions, high- or low-fat.
- V. Low-moisture fats and oil.
- VI. Beverages:
 - A. Containing up to 8 percent of alcohol.
 - B. Nonalcoholic.
 - C. Containing more than 8 percent alcohol.
- VII. Bakery products other than those included under Types VIII or IX of this table:
 - A. Moist bakery products with surface containing free fat or oil.
 - B. Moist bakery products with surface containing no free fat or oil.
- VIII. Dry solids with the surface containing no free fat or oil (no end test required).
- IX. Dry solids with the surface containing free fat or oil.

TABLE 2-TEST PROCEDURES WITH TIME TEMPERATURE CONDITIONS FOR DETERMINING AMOUNT OF EXTRACTIVES FROM THE FOOD- CONTACT SURFACE OF UNCOATED OR COATED PAPER AND PAPERBOARD, USING SOLVENTS SIMULATING TYPES OF FOODS AND BEVERAGES

Condition of use	Types of food (see Table 1)	Food-simulating solvents			
		Water	Heptane ¹	8 percent alcohol	50 percent alcohol
		Time and temperature	Time and temperature	Time and temperature	Time and temperature
A. High temperature heat-sterilized (e.g., over 212 F).	I, IV-B, VII-B III, IV-A, VII- A.	250° F, 2 hrdo..... 150° F, 2 hr
B. Boiling water sterilized	II, VII-B. III, VII-A	212° F, 30 min.do..... 120° F, 30 min.
C. Hot filled or pasteurized above 150 F.	II, IV-B, VII-B III, IV-A, VII- A. V, IX	Fill boiling, cool to 100° F.do..... 120° F, 15 min.do.....
D. Hot filled or pasteurized below 150 F.	II, IV-B, VI-B, VII-B III, IV-A, VII- A V, IX..... VI-A..... VI-C..... 150° F, 2 hr.do..... 100 F, 30 min.do..... 150° F, 2 hr. 150° F, 2 hr.
E. Room temperature filled and stored (no thermal, treatment in the container).	I, II, IV-B, VI- B VII-B III, IV-A, VII-A V, IX..... VI-A..... VI-C.....	120° F, 24 hr.do..... 70° F, 30 min.do..... 120° F, 24 hr. 120° F, 24 hr.
F. Refrigerated storage (no thermal treatment in the container).	III, IV-A, VII- A. I, II, IV-B, VI- B, VII-B VI-A..... VI-C.....	70° F, 48 hr.do.....	70° F, 30 min. 70° F, 48 hr. 70° F, 48 hr.
G. Frozen storage (no thermal treatment in the container).	I, II, IV-B, VII-B III, VII-A.....	70° F, 24 hr.do..... 70° F, 30 min.
H. Frozen or refrigerated storage: Ready-prepared foods intended to be reheated in container at time of use.
1. Aqueous or oil-in-water emulsion of high- or low-fat.	I, II, IV-B, VII-B.	212° F, 30 min.
2. Aqueous, high- or low-free oil or fat.	III, IV-A, VII-A, IX.do..... .	120° F, 30 min.

¹ Heptane extractability results must be divided by a factor of five in arriving at the extractability for a food product having water-in-oil emulsion or free oil or fat. Heptane food-simulating solvent is not required in the case of wax-polymer blend coatings for corrugated paperboard containers intended for use in bulk packaging of iced meat, ice