DU PONT'S POST-HEARING COMMENTS ON THE
PROPOSED POLYCHLORINATED BIPHENYLS
MANUFACTURING, PROCESSING, DISTRIBUTION
IN COMMERCE, AND USE BANS REGULATION

Du Pont is a significant U.S. producer of phthalocyanine crudes and the finished pigments made from these crudes. We do not manufacture diarylide pigments and we consider the two classes of pigments to be quite different in regard to the difficulties in analyzing for PCB content and the problems in producing low PCB products. Our comments relate solely to the phthalocyanine pigments.

Phthalocyanine crudes can be made by processes which use solvents such as nitrobenzene, trichlorobenzene (TCB), and kerosene, or by nonsolvent-based processes. It appears that the crudes made with TCB are highest in PCBs and may contain PCB over the proposed 50 ppm limit. Du Pont manufactures its own crudes by a non-TCB-based process; these crudes contain under 50 ppm polychlorinated biphenyls.

As was stated at the hearing, a 50 ppm ban on PCBs which is effective January 1, 1979, would cause disruption to some pigment producers and downstream industries. Testimony indicated that a two-year exemption period is needed to alleviate the problems which would exist. However, crudes made from solvents other than TCB or no solvent at all and which contain low levels of PCBs are available for purchase and could be used to comply with the proposed regulation.

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One pigment manufacturer commented at the hearing that tests he has performed on low PCB crudes indicate they are inferior because the "physical characteristics are changed in a deleterious and adverse manner." Du Pont has used non-TCB-based crudes for 30 years and produces a full line of commercially acceptable products.

References were also made at the hearing as to the lack of a valid analytical technique for determining the PCB content of these pigments due to the difficulty in extracting PCBs from the pigment aggregate. The Du Pont Company has developed an analytical procedure for the determination of total polychlorinated biphenyls in phthalocyanine blue pigments. A copy of this procedure is attached. This procedure obviates the problem of incomplete extraction of the PCBs, the problem alluded to during the hearing as the main source of difficulty in the analysis. Total extraction is accomplished in the Du Pont procedure by the complete dissolution of the pigment in sulfuric acid, thereby assuring the total liberation and quantitative recovery of the PCBs during the subsequent hexane extractions. The Dry Color Manufacturers Association was provided with copies of the procedure on August 28, 1978, and an industry "round robin" study was proposed. With diligence and appropriate priority, this procedure can be validated within a short period of time.

In summary, we are in agreement with the Dry Color Manufacturers Association's statement that a January 1, 1979

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ban on materials containing greater than 50 ppm PCBs will present compliance difficulty to some members of the pigment industry. An analytical technique was not available until very recently and has not yet been fully studied by the industry. However, we feel that the Du Pont method is a valid one and will be acceptable to others in the industry. Those manufacturers finding that the crudes they make or process contain over 50 ppm PCBs could then come into compliance by modifying their processes to make low PCB pigments from purchased low PCB crudes.

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