

L. A. Hoellen) IN
D. P. Sullivan) TURN
J. W. Emrich

October 19, 1972

T. A. WIENKE
LINCOLNWOOD

As discussed by phone, we do not currently plan to divulge our formulas to customers and Air pollution Control agencies. Since Illinois has a Rule 66-Type regulation, solvent breakdown by photoreactivity Class A, B, C and the percent solids should suffice. We suggest the following reply to Electrographic Corp.:

This is in response to your recent request for information about our paint compositions that you need to supply to the Illinois Environment Protection Agency.

The Du Pont Company has expended considerable effort in the past several years to develop finishes that contain a minimum of photochemically reactive solvents yet maintain properties essential to product quality. For several years, we have sold paints to customers requesting them that conform to Los Angeles' Rule 66. We are rapidly reformulating most of our paint lines to conform to Rule 66 type regulations. We are also actively developing water-borne finishes and high solids finishes, use of which will greatly reduce solvent emissions.

At the present time, about fifteen states, including Illinois, have adopted air pollution control regulations patterned after Rule 66. This Rule defines a photochemically reactive solvent as any solvent with an aggregate of more than

N38308

20% of its total volume composed of chemical compounds classed as shown below or which exceeds any of the following individual percentage composition limitations:

- A. A combination of hydrocarbons, alcohols, etc. having an olefinic type of unsaturation 5%
- B. A combination of aromatic compounds with 8 or more C atoms to the molecule except ethylbenzene 8%
- C. A combination of ethylbenzene, ketones with branched hydrocarbon structures, or toluene 20%

The solvent composition of the paints about which you inquired (expressed as percentages falling under each of the above classes) are shown below:

<u>Product</u>	<u>Volume %</u>			<u>Total</u>	<u>% Solids (wt.)</u>
	<u>A</u>	<u>B</u>	<u>C</u>		
655-1924 Black Sealer	0	13.1	1.2	14.4	33.2
65-12105 Gray Primer	0	34.0	5.0	39.0	66.6
81-43325 Green Enamel	0	81.2	9.8	91.0	38.4
81-43271 Black Enamel	0.01	83.2	6.8	90.1	34.8
81-43275 White Enamel	.03	23.2	4.8	28.1	51.1
63-8095 Black Primer	.1	76.2	3.4	79.7	52.7

<u>Product</u>	<u>A</u>	<u>B</u>	<u>C</u>	<u>Total</u>	<u>% Solids (wt.)</u>
181-23994					
Aluminum	.1	76.2	3.4	79.7	52.7
81-43313					
Red Enamel	.03	78.1 68.5	10.6 9.3	88.7 77.8	43.9 35.0

*Called Ron with
checked about
T. Winkler + told him
a correction
11-7-72
8-31-72
form.
says
35.0%*

Obviously, the solvents in these paints are photochemically reactive. However, we plan to reformulate these products with solvents which are not photochemically reactive as defined by Illinois regulations. We expect to have RE-formulated paints available by _____, 1973.

I trust that the above information meets your needs. If we can be of further assistance, please let us know."

If this doesn't satisfy the Illinois EPA, please let us know.

E. E. SWAIN, JR.
POLLUTION CONTROL COORDINATOR

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