

October 9, 1972

Mr. Anthony Fratturo
Department of Health
Air Pollution Division
229 North Street
City of Stamford
Connecticut 06902

Dear Mr. Fratturo:

This is in response to your recent request to our Long Island City Office for information concerning our paints used by Peabody Engineering Co.

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.

2. *Illinois*
~~Connecticut~~ At the present time, about fifteen states, including Connecticut, 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

N38307

2a 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 [or trichloroethylene] 20%

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

	Rule 66 Class			Volume %
	A	B	C	Total
Dulux® High Gloss Mach. Enamel 81-24910	.09	17.	.03	17.1
Dulux® Enamel 81-23663	0.9	15.2	.02	16.1
Lacquer Thinner 3661S	0	1.6	12.5	14.1

4. Obviously, the first two are considered to be photochemically reactive. However, these paints are being reformulated with solvents which are not photochemically reactive as defined by your state regulations. We expect to have the reformulated paints available for shipment by January, 1973.

- 3 -

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

Very truly yours,

E. E. Swain, Jr.
Pollution Control Coordinator

RES:ps

B.P.S. - Do you concur with this type of response to customers
or government agencies that request detailed formula
compositions?

E.E.S.