Vista Chemical Company

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September 12, 1989

VISTA

Ms. Lynn Bradley
Chemistry Section/Registration Division
Mail Code T5767
Office of Pesticide Programs
EPA
401 M Street, S.W.
Washington, D. C. 20460

Dear Ms. Bradley:

This letter is to provide ultraviolet absorbance data for the LPA Solvents to verify those products which meet all the physical requirements of 21 CFR 172.884. The data requested is attached. It is my understanding that you will provide Vista a letter as requested to verify your agreement that our products do meet the definition in 21 CFR 172.884.

Also we are requesting the establishment of a Pesticide Ingredient Inert Master File be established for these solvents, in case confidential business information is necessary in the future.

Thank you for your attention to this matter.

Sincerely,

Thomas G. Grumbles

Thomas G. Grumbles, C.I.H.
Environmental Quality Manager

dlj

Attachment

VVV 000013936

To: Tom Grumbles, Environmental, Houston

Interoffice Communication

From: W. L. Sorensen, R&D, Ponca City
Date: September 8, 1989

VISTA
LPA Solvents

Subject: **21CFR 172.884 Specs for LPA-140 and LPA**

Attached is ASR-04-86-6814-20, which concludes that LPA-210 meets the UV requirements for 21CFR 178.3620 (c) - technical white mineral oil. The technical white mineral oil UV specifications are more restrictive than the 21CFR 172.884 - odorless light petroleum hydrocarbons. Hence LPA-210 should pass the odorless light petroleum hydrocarbon UV specifications with no problems.

LPA and LPA-140 should also pass the 21CFR 172.884 UV specifications because they contain less aromatics than LPA-210. Some GC/MS work (2-26-87) indicated LPA-210 had 0.6% aromatics, LPA-140 had 0.2% aromatics which means LPA would have ~0.3% aromatics. This assumes the UV test is basically a test for aromatic content.

Wayne L. Sorensen
Wayne Sorensen
Chemicals Technology

jms

cc: JTF, JFL, JCP, RLP, RBM

ASR No.: ASR-04-86-6814-20

TO: M. M. Goodreau, Environmental, Houston

FROM: T. M. Latimer, Research and Development, Ponca City
DATE: December 22, 1986

eroffice
mmunication

VISTA

SUBJECT: FDA REQUIREMENTS FOR MINERAL OILS (21CFR 178.3620(c)): LPA210 AND C_{1416} NORMAL PARAFFINS

OBJECT: To determine if LPA-210 and C_{1416} normal paraffins meet the FDA requirements set forth in 21 CFR 178.3620(c) for mineral oils used in rolling oil applications.

KEYWORDS: FDA, LPA, Normal Paraffins

CONCLUSIONS

Sample 1416-101 (C_{1416} normal paraffins) and sample 7010-L611 (LPA-210) meet the FDA requirements for initial boiling point, color and ultraviolet absorbance. The results are given in Table 1.

SUMMARY

The methods used in this work were ASTM D86 for the initial boiling point, ASTM D1500-82 for color and 21CFR 178.3620(c) for the ultraviolet absorbance. The detailed procedure for the determination of the absorbance is attached to the end of this report. The experimental section which follows is a brief summary of the absorption procedure. The resulting UV spectra are shown in Figure 1. The distillation data for the samples are given in Appendix 1.

Toni Latimer

T. M. Latimer
Research Chemist

jms

cc: DRW JTF WLS - Ponca City
PQ JJU FRW - Houston
KBY - LCCP
JLN - Oak Brook

VVV 000013938

SUMMARY OF THE EXPERIMENTAL PROCEDURE FOR THE DETERMINATION OF THE ULTRAVIOLET ABSORBANCE.

All glassware was washed with chromic acid, rinsed thoroughly with deionized water and allowed to air dry.

All reagents were tested and found to meet the specifications of the method. A list of the reagents used is attached in Appendix 2.

The instrument used to measure the ultraviolet absorbance was an IBM 9420 UV-Visible Spectrophotometer.

A 20 gram sample of the oil was dissolved in isooctane and extracted three times with a mixture of dimethyl sulfoxide and phosphoric acid ($DMSO/H_3PO_4$). The $DMSO/H_3PO_4$ solution was diluted 3:2 with water and back extracted twice with isooctane. The isooctane back extracts were washed three times with water, filtered through anhydrous sodium sulfate and combined in an Erlenmeyer flask. 1 ml of hexadecane was added and the isooctane was removed by evaporation on a steam bath under a stream of nitrogen to concentrate the extracted residue to a volume of 1 ml. The residue was transferred to a 200 ml volumetric flask and made to volume with isooctane. The absorbance was measured in 1 cm cells compared to isooctane as the reference.

Both samples met the absorbance specifications at this point and it was not necessary to perform the chromatography portion of the procedure.

TABLE 1

RESULTS OF THE FDA SPECIFICATION TEST
21 CFR 178.3620 (c)

SAMPLE	INITIAL BOILING POINT	COLOR	MAXIMUM ULTRAVIOLET ABSORBANCE 280–289nm	290–299nm	300–359nm	360–400nm
1416-101 C1416 Normal Paraffins	476.6°F	<0.5	0.273	0.188	0.111	0.006
7010-L611 LPA-210	461.4°F	<0.5	0.009	0.007	0.005	0.001
Reagent BLANK(a)			0.002	0.002	0.001	0.001
FDA Specification	>450°F	≤ 5.5	≤ 0.7	≤ 0.6	≤ 0.4	≤ 0.09

(a) The Reagent BLANK is used only in the UV-absorbance test.

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