Copy for PRC
OK V.H.
Pollution file.

February 23, 1973

Mr. Victor Weiss
Pervel Industries, Inc.
Community Avenue - Foot
of Fifth Street
Plainfield, Connecticut 06374

Dear Mr. Weiss:

I have been asked to send you an opinion as to whether or not our Santicizer 711 or a second plasticizer, Diotylphthalate, are photochemically reactive.

I know of no evidence that either of these materials can be classified as photochemical reactants. Phthalate plasticizers are high molecular weight liquids with low vapor pressure and high boiling points or distillation ranges. They are not classified to my knowledge as organic solvents.

Although I have reviewed a number of lists of solvents and other organic liquids, I have found no references to phthalates as being included in the reactive category.

The question of control of emmissions of hydrocarbon and other organic materials is being reviewed by the Environmental Protection Agency in North Carolina with members of the Air Quality Committee of the Manufacturing Chemists Association. As indication that EPA is considering additional exemptions of organic materials which need not be subject to the restrictions for many other materials, is the publication in the February 8, 1973 Federal Register that EPA has exempted additional compounds from control. In this particular case, the exemptions are for components of waste gas streams in Louisiana. Of interest, however, is the inclusion in the exemption of methyl benzoate. If EPA feels that this compound does not require strict control, I can't conceive that a phthalate ester would be considered in a different light.

I have tried today, unsuccessfully, to reach by telephone specific individuals in the EPA Offices at Raleigh-Durham, North Carolina, attempting to clarify the relationship between phthalate esters and the photochemical reactant smog problem. I will continue to try to reach the proper people early next

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week and will forward any information that I obtain that would be helpful or of interest.

Very truly yours,

Elmer P. Wheeler
Manager, Environmental Health

EPW/slb

cc: James E. Springgate

bc: Joseph Darvy

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