

ENVIRONMENTAL ASSESSMENT

1. **Date** May 2, 2000.
2. **Name of Applicant** Lubrizol Corporation.
3. **Address** All communications on this matter are to be sent in care of Counsel for applicant:
Ralph A. Simmons
Keller and Heckman LLP
1001 G Street, N.W., Suite 500 West
Washington, D.C. 20001
Telephone: (202) 434-4120.

4. Description of the Proposed Action:

The action proposed in this request is the Agency's review of a food-contact substance notification, pursuant to 21 U.S.C. § 348(h)(1), submitted by the notifier for sebacic acid when used at levels not to exceed 0.5 percent as an antiwear agent in lubricants with incidental food contact. Keller and Heckman submitted this notification on behalf of Lubrizol Corporation on May 2, 2000.

5. Environmental Consequences of the Proposed Action:

a. Production of the food-contact substance:

There are no extraordinary circumstances that pertain to the manufacture of the food-contact substance. Therefore, no information on potential environmental impacts is required.

b. Use and disposal of the food contact substance:

This action involves the Agency's review of a food-contact notification for a substance that is properly considered a component of articles intended for repeated use. The principal route of potential environmental introduction of the food-contact substance results from its disposal

after use. However, the potential for significant introduction of substances resulting from disposal is very low because of the long service life of the repeat use articles. The typical food processing plant uses a system containing approximately 1000 gallons of hydraulic fluid. This fluid is completely replaced approximately every two years. In addition, the sebacic acid will be used at very low concentrations (0.5 percent) in the hydraulic fluid. Therefore, the Agency's review of this notification will not have a significant environmental effect.

6. Alternatives to the Proposed Action:

Alternatives to the proposed action need not be considered because no potential adverse effects have been identified.

7. List of Preparers


- a. Ralph A. Simmons, Partner, Keller and Heckman LLP,
1001 G Street, N.W., Suite 500 West, Washington, D.C. 20001.
- b. Michael T. Flood, Staff Scientist, Keller and Heckman LLP,
1001 G Street, N.W., Suite 500 West, Washington, D.C. 20001.

8. Certification

The undersigned certifies that the information provided herein is true, accurate, and complete to the best of his knowledge.

Date: May 2, 2000




Ralph A. Simmons
Counsel for Lubrizol Corporation