

## Environmental Assessment for a Food-Contact Substance

1. **Date:** January 15, 2001
2. **Name of sponsor:** Ciba Specialty Chemicals Corporation.
3. **Address:** 4050 Premier Drive, High Point, NC 27231 - 2678
4. **Description of the proposed action:** the PMN substance (pigment) is to be incorporated into polymers (all types) by Ciba's customers, Polymer manufacturing facilities. The pigment is to function as a colorant in the polymer at concentrations not to exceed 0.025% weight. The pigment may be used by itself or in combination with other FDA compliant colorants. The technical effect is to impart coloration to the food contact polymer (all food types) for both identification and aesthetic purposes. Coloration provides visual effect to identify food materials in the package and provide easier match up with the container and the lid. The colorant may be used to help market food manufacture's products by providing unique coloration identification for retail customer product recognition.

e. **Identification of the Food-contact substance:**

Chem. Name: Quino[2,3-b] acridine-7,14-dione, 4,11-dichloro-5,12-dihydro-

Abbreviated Name: 4,11-DCQA

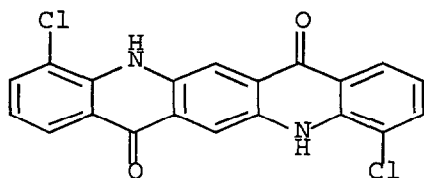
Molecular formula:  $C_{20}H_{10}Cl_2N_2O_2$

Molecular weight: 381

CASRN: 3089-16-5

Physical Description: Red, solid, powder.

Structure:



6. **Environmental consequences of the proposed action:**

- a. Production of the food contact substance: 4,11-DCQA has been manufactured in the United States for approximately 40 years. Ciba Specialty Chemicals Corporation manufacturing facility is in . The Manufacturing Plant operates in compliance with the

laws and regulations of the State of \_\_\_\_\_ and of the United States EPA and maintains environmental permits for the facility's operations. There are no unique emission circumstances that are not adequately addressed by the facility's existing environmental permits. The production facility does not adversely affect a species, flora or fauna, or critical habitat of a species, threatened, endangered or otherwise. It has been determined that no extraordinary circumstances apply to the manufacture of this food contact substance.

b. Use and disposal of the food contact substance: This action involves Quino[2,3-b] acridine-7,14-dione, 4,11-dichloro-5,12-dihydro- (4,11-DCQA), that is a minor component of finished polymeric food-packaging materials present at 0.025% by weight of the finished packaging material and that remains with the packaging through its use by consumers. The principal routes of environmental introduction of 4,11-DCQA follow from the disposal of food packaging material containing it in municipal solid waste combustors or in landfills. These disposal routes are governed by the Environmental Protection Agency's (EPA) regulations in 40 *CFR* Part 60 (for combustors) and Part 258 (for landfills). Based on the low levels of the food contact substance in the packaging material, the introduction of combustion products or introductions at landfill sites are not environmentally significant. Therefore, we do not expect that any limited increase in environmental introductions resulting from the proposed action will threaten a violation of EPA's regulations governing combustors and landfills or have any other adverse environmental effect.

7. **Alternatives to the Proposed Action:** Alternatives to the proposed action need not be considered because no potential adverse effects have been identified.

8. **List of Preparers:** this Environmental Assessment was prepared by:  
Name: J. Kenneth Taft Title: Product Stewardship Manager  
Education: U. of Massachusetts, Amherst, MA: B.S. Biology  
Drexel U., Philadelphia, PA: M.S. Environmental Engineering  
Experience: 24 years in Health, Safety and Environmental (EHS) profession.

9. **Certification:** The undersigned official certifies that the information presented is true, accurate, and complete to the best knowledge of Ciba Specialty Chemicals Corporation.

January 15, 2001

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Signature of responsible official

J. Kenneth Taft, Product Stewardship Manager, Ciba Specialty Chemicals Corp.

Name and title of responsible official, printed or type

000115.001

**9. CERTIFICATION STATEMENT:**

It is hereby certified that the accuracy of the statements made in this Pre-Market Notification (PMN) for 4,11-Dichloro Quinacridone are the best prediction of the anticipated facts for indirect food contact use of the polymer colorant described here.

It is also certified that the information provided here is accurate and complete to the best of my knowledge, and that all information relevant to the safety of the food contact substance (FCS) have been addressed in this notification.

[Redacted Signature Box]

J. Kenneth Tatt, Product Stewardship Manager  
Authorized Official, Ciba Specialty Chemicals

January 15, 2001  
Date