

ENVIRONMENTAL ASSESSMENT

1. **Date** August 18, 2000
2. **Name of Applicant/Notifier** DuPont Dow Elastomers L.L.C.
3. **Address** All communications on this matter are to be sent in care of Counsel for Notifier, Jerome H. Heckman, Keller and Heckman LLP, 1001 G Street, N.W., Suite 500 West, Washington, D.C. 20001. Telephone: (202) 434-4110.
4. **Description of the Proposed Action**

The action requested in this Notification is the establishment of a clearance to permit the use of certain perfluorocarbon cured elastomers as components of repeated-use food contact articles in contact all types of food under all conditions of use. The perfluorocarbon cured elastomers are produced by polymerizing perfluoro(methyl vinyl ether) (CAS Reg. No. 1187-93-5) with tetrafluoroethylene (CAS Reg. No. 116-14-3) and perfluoro(8-cyano-5-methyl-3,6-dioxa-1-octene) (CAS Reg. No. 69804-19-9). The terpolymer thus formed (CAS Reg. No. 71832-66-1) is cured with the use of trimethylallyl isocyanurate (CAS Reg. No. 6291-95-8) and/or triallyl isocyanurate (CAS Reg. No. 1025-15-6), and with 2,5-dimethyl-2,5-di(*t*-butylperoxy)hexane (CAS Reg. No. 78-63-7). The subject perfluorocarbon elastomers will be used as the basic polymer in the manufacture of repeated-use food-contact articles.

000130

5. Environmental Consequences of the Proposed Action

- a. *Production of the food-contact substance:* There are no extraordinary circumstances that apply to the manufacture of the food-contact substance that would present a significant environmental effect from the proposed action.

- b. *Use and disposal of the food-contact substance:* This action involves a food-contact substance that is a component of repeated use articles. 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 repeated-use articles manufactured from the perfluorocarbon elastomers (such articles will have a useful service life of at least 6 months) and because of the limited market volume of the substance (an estimate of the market volume of the perfluorocarbon elastomers is provided separately in a confidential section of the Notification). Therefore, the proposed action 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

- c. Lester Borodinsky, Staff Scientist, Keller and Heckman LLP, 1001 G Street, N.W., Suite 500 West, Washington, D.C. 20001; Ph.D. in Chemistry.

8. Certification

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

Date: August 18, 2000



 Jerome H. Heckman

Counsel for DuPont Dow Elastomers L.L.C.