

**ENVIRONMENTAL ASSESSMENT**

Date: ~~April~~ ^{May 2} 10, 2000 ^{LWB}

Name of sponsor: Ciba Specialty Chemicals Corporation

Address: 4090 Premier Drive

High Point, NC 27265

Description of the proposed action:

It is proposed that Glycine, N, N-bis[2-hydroxy-3-(2-propenyloxy)propyl]-, monosodium salt, reaction products with ammonium hydroxide and pentafluoroiodoethane-tetra-fluoroethylene telomer (perfluoroalkyl substituted carboxylic acid) be permitted as an oil and water repellent in an amount not to exceed approximately 0.75 % actives by weight (0.39 % fluoride) of finished paper or paperboard (15 lbs of actives per ton of paper or paperboard), where such treated paper or paperboard has a sheet basis weight of up to approximately 300 lbs per 3000 square feet; as determined by analysis for total fluorine in the treated paper or paperboard. This compound is a particularly effective oil and water repellent for different types of paper and paper board. It has a very high extraction resistance and very low volatility. This additive will be used in paper manufacturing plants in the U.S.; however, these types of paper and paperboard are produced by only a few companies, limiting use exposure. Such treated paper and paperboard articles are intended for general applications such as the processing, packaging, transportation, holding, and serving of aqueous and fatty foods.

Environmental consequences of the proposed action:

- a. Ciba Specialty Chemicals will produce perfluoroalkyl substituted carboxylic acid at its manufacturing facility in . Ciba Specialty Chemicals is manufacturing this material in compliance with all permits and regulations applicable to the manufacturing site in No extraordinary circumstances apply to the manufacture of perfluoroalkyl substituted carboxylic acid.

000305

- b. This action involves a food-contact substance that is a minor component of finished food-packaging materials present at 0.75 % by weight (actives) of the finished packaging material and remains with the packaging through its use by consumers. The principal routes of environmental introduction of the food-contact substance will result from its disposal in municipal solid waste

combustors or in landfills. These disposal routes are governed by Environmental Protection Agency (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, 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 the EPA regulations governing combustors and landfills or have any other adverse environmental effect.

Alternatives to the proposed action:

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

List of preparers:

Prepared by: Frances E. Knight, Ph.D.
Title: Product Registration Manager
Background: Chemist

Certification: Provide a signed and dated statement such as the following:

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

May 2, 2000
Date

Signature of responsible official 

Frances E. Knight, Ph.D. – Product Registration Manager
Name and title of responsible official, printed or typed

000306