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Will Perry #041108ULL
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FVI-079V-1162



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March 20, 1984

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Mr. Martin Greif
Executive Secretary (MS-792)
Toxic Substances Control Act
Interagency Testing Committee
401 M Street, SW
Washington, DC 20460

Confidential

Dear Mr. Greif:

The Chemicals Division of Eastman Kodak Company provides the following information on a chemical substance reported for the TSCA Inventory by Eastman Kodak Company and listed in the Federal Register notice of November 9, 1983 (48 FR 51519).

CAS No. 81-55-0 1,8-Dihydroxy-4,5-dinitroanthraquinone;
(4,5-dinitrochrysazin); (DNC)

1. Physical Properties and Production Volume

Yellow, water insoluble solid (m.p. 295-301°C) manufactured by Eastman Kodak with an annual current and future projected production range of 20,000-80,000 kg.

2. Use

Used solely as a site-limited intermediate that is completely consumed in a subsequent chemical reaction. Production and use are restricted to one building.

3. Occupational Exposure

About 35 workers are involved in the manufacture and use of DNC with a typical total annual potential exposure time of 30 hours per worker.

DNC is manufactured in an enclosed reactor, filtered, and the nondusty, water-wet cake is loaded directly into a dryer. Workers wear a plastic apron or disposable plastic coveralls, safety goggles, cap, rubber gloves, and safety shoes during the loading operation.

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Dried DNC is drummed inside of an exhaust hood to control any dust. Workers wear an OSHA approved respirator in addition to the above listed protective clothing and are required to take a shower and change clothes on completion of this operation.

The dry DNC is loaded into another reactor with an exhaust draft at the open loading port. Again workers wear an OSHA approved respirator and protective clothing and are required to shower and change clothes after loading. DNC is then reacted and completely consumed to produce another chemical.

4. Releases

All waste streams are aqueous and are discharged to an activated sludge, waste water treatment plant. We are in production of DNC approximately one-half of the year. During this time, approximately 15-20 pounds of DNC is transferred to waste treatment per day. We expect that the DNC transferred to waste treatment is removed and is not discharged to the environment.

Based on Eastman's handling of DNC, we conclude that insignificant worker exposure or environmental release of this site-limited substance occurs. No general population exposure results from our production or use.

If DNC is imported or manufactured by others, it would probably be used as an industrial dye intermediate. Such use would not be expected to result in any general population exposure.

Health and safety studies on DNC are being forwarded to you directly from the Health and Environmental Laboratories of Eastman Kodak Company.

Yours very truly,


D. W. Kreh
Manager
Product Safety Program
P. B. Box 1972

spb/TR30841



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