Industry Regulatory Drivers
• USEPA Premanufacturing Notices (PMN) - no guarantee of commercial use in EU or Asia with PMN
• FIFRA Registrations
• USFDA Food Contact Notifications
• Canada New Substances Notifications (NSN)
• PMRA Registrations
• EU REACH Dossiers
• Turkey REACH, Korea REACH, Taiwan, China, Etc.

• Limited timelines for registering new substances that are commercially viable
Color Pigments
Characteristics &
Customer Requirements
✓ Chroma ✓ Broad shade functionality
✓ Durability/lightfastness
✓ Opacity/transparency ✓ Low metamerism
✓ Dispersibility
✓ Heat stability
✓ Solvent resistance
✓ Gloss retention
✓ Color strength
✓ Fitness for purpose (performance level)
✓ Regulatory status
✓ Cost ✓ Availability

Good Dispersibility
Good Durability
Bad Dispersibility
Bad Dispersibility
Poor Durability
Poor Durability
Poor Durability

Transparent Opaque
• PCB Chemical Action Plan (2015)
• DOE PCBs in Products Study (2015)
• EPA Region 10 Water Quality Regulations (2016)
• Orca Whale Task

Force (2018)
• Environmentally Preferable Purchasing Guidelines (2019)
• Safer Products Legislation (2019)
• EPA Region 10 Water Quality Regulations (2019)

Practical Considerations
➢ Very low limits for PCBs in NPDES permits → not feasible for regulated entities
➢ Current Washington State water quality testing (Spokane River) incomplete → not all sources of PCBs have been identified
➢ Current Washington State regulatory approach inconsistent with existing global regulatory landscape and global supply chain requirements
Thank you!

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