

**CHLORINATED PARAFFINS: UPDATE ON CANADIAN ACTIVITIES**

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This article is an update to the April 2009 article in *Compounding* concerning Canada's proposed action to add all Chlorinated Paraffins (CPs) (S, M and L) to CEPA (Canadian Environmental Protection Act) Schedule 1 - "CEPA Toxic" – and to seek the "virtual elimination" (VE) of CP up to C<sub>20</sub>. [See box below about CPs.] In seeking VE, Canada has indicated that it would propose a prohibition regulation of C<sub>10</sub> to C<sub>20</sub> CPs, which would essentially ban the use of SCCPs and MCCPs in Canada except where specific "use exemptions" are granted. The Chlorinated Paraffins Industry Association (CPIA), Dover Chemical, ILMA, and numerous Canadian companies have raised significant concerns with Canada's risk conclusions that form the basis for this proposed action.

Despite industry objections to the risk assessment, Environment Canada (EC) continues to move forward with the development of risk management plans for CPs, including the recently released October 2009 "Consultation Document", as it must propose risk management instruments within 2 years (by August 2010) of a substance being proposed as CEPA toxic.

The Consultation Document was presented by EC to industry stakeholders at an October 22, 2009, Workshop in Toronto and received significant negative response from industry. Participants noted that Canada has yet to address the concerns raised regarding the risk assessment or to respond to the official Notice of Objection that CPIA filed. Industry representatives at the workshop noted that these technical objections are especially important to resolve given Canada's proposal for a prohibition regulation. Canadian officials at the workshop acknowledged these concerns with the risk assessment and indicated that they will be considered in their response. CPIA and others submitted written comments on the Consultation Document to EC in November 2009 and will continue to seek a revised approach on risk management away from a prohibition regulation.

There have been some notable improvements to the Canadian risk management proposal since first announced last year, including the exemption of imported finished solid goods that contain CPs (e.g. vinyl products) and not seeking prohibition of C<sub>20+</sub> CPs, which includes most LCCPs. Canada also is proposing to include a time-limited use exemption for MCCPs in metalworking fluid (MWF) applications. While this would offer relief to fluid providers and users in Canada for several years after the rule goes into effect (anticipated to be 2012), CPIA continues to argue that the overall approach (prohibition) is unnecessary and inappropriate. MWF applications for CPs should be allowed to continue for all those operations that properly manage their fluids and

minimize releases to the environment. Industry participants at the workshop indicated MWFs are being used in an environmental sensitive way and provided several examples of programs that ensure proper handling and disposal of MWFs. CPIA is working with downstream companies and organizations to develop appropriate risk management practices (instruments) for Canada to use in its regulations instead of prohibiting their use.

### **CPIA Seeking to Engage Chlorinated Paraffin Users in Response to Canada**

CPIA is encouraging the downstream metalworking industry to become actively engaged in responding to Canada's proposals on CPs and to advocate for the adoption of reasonable risk management approaches that will enable the continued safe use of chlorinated paraffins. CPIA is eager to work with CP users in Canada/North America to collect information about CP downstream operations and end-of-life waste management practices in order to demonstrate to Canadian officials that CPs are appropriately handled and releases to the environment are minimized. We are organizing downstream industry groups, including one for metalworking CP applications, to develop these risk management materials. For additional information, please contact CPIA ([ajques@regnet.com](mailto:ajques@regnet.com); [r Fensterheim@regnet.com](mailto:r Fensterheim@regnet.com); website: [www.regnet.com/cpia](http://www.regnet.com/cpia)) or Dover Chemical ([tkelley@doverchem.com](mailto:tkelley@doverchem.com)).

#### **What are Chlorinated Paraffins?**

Chlorinated paraffins (CPs) are an important class of chlorinated straight-chained hydrocarbons in the carbon range of C<sub>10</sub> to C<sub>30</sub>. CPs are subdivided into three categories based on their carbon chain lengths:

Short-chain (SCCP)	C <sub>10-13</sub>
Medium-chain (MCCP)	C <sub>14-17</sub>
Long-chain (LCCP)	C <sub>18-30</sub>

These compounds have many cost-effective uses including as extreme pressure additives in lubricants and metalworking fluids.