



PILKINGTON

November 21, 2011

Mr. Hamid Saebfar
Department of Toxic Substances Control
1001 "1" Street, P.O Box 806
Sacramento, CA 95812

Re: Formal Request for Chemical Information and Analytical Test Method for Specified Nanomaterials

Dear Mr. Saebfar:

This letter is a response to your letter of October 27, 2011 requesting chemical information and analytical test method for specified nanomaterials. Please see the attached letter that has been sent to the DTSC regarding this subject matter. If you have any questions, please contact us.

Attached are the followings:

- 1) A letter that was sent from the DTSC to Pilkington North America, Lathrop CA on December 21, 2010
- 2) A letter that was sent from Pilkington North America, Lathrop CA to the DTSC on February 14, 2011.
- 3) A letter that was sent from the DTSC to Pilkington North America, Lathrop CA on October 27, 2011

Sincerely,

Cyndi Ward
EH&S Manager
PNA Lathrop Plant
(209) 858-6358



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Deborah O. Raphael, Director
1001 "I" Street
P.O. Box 806
Sacramento, California 95812-0806



Edmund G. Brown Jr.
Governor

October 27, 2011

Mr. Chris Miller
Plant Manager
Pilkinton
500 East Louise Avenue
Lathrop, California 95330

Deadline Approaching for Submission of Chemical Information and Analytical Test Methods

Dear Mr. Miller:

On December 21, 2010, the Department of Toxic Substances Control (DTSC) formally requested information on chemical and physical properties, including analytical test methods and other relevant information about six specific chemicals. Your company or institution has been identified as a manufacturer who produces or imports one or more of the following nanomaterial chemicals:

- Nano Silver
- Nano Zero Valent Iron
- Nano Cerium Oxide
- Nano Titanium Dioxide
- Nano Zinc Oxide
- Quantum Dots

Pursuant to California Health and Safety Code sections 57018-57020, manufacturers, including importers to California, must provide requested information in writing no later than one year from the formal request letter noted above. **We are now within 60 days of that statutory deadline.** DTSC remains vitally interested in information related to analytical test methods for these chemicals in environmental matrices, including water, air, soil, sediment, sludge, and chemical waste.

Pilkinton
October 27, 2011
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Prior to the formal request, DTSC compiled information on the six nanomaterials, analytical test methods for those chemicals, and other relevant information. The bibliography has been posted since the formal request and is accessible at the DTSC website in the "References and Documents" section at the following web site.
<http://www.dtsc.ca.gov/TechnologyDevelopment/Nanotechnology/nanometalcallin.cfm#RefDocs>

The two lists of manufactures who are receiving this reminder letter can be found at the same site. Further, an enclosure was provided for your convenience with the formal Call-in letter, providing a useful structure for crafting your response. If you choose to use that suggested structure, it is also available at the above web site.

We continue to encourage a collaborative approach to compiling the requested information and look forward to insightful solutions that will shed light on practices, procedures, methods, and controls that will better guarantee the safety of your products and protect your employees, users of your materials, and the environment.

The deadline for providing this information is Wednesday, December 21, 2011. If you have any questions or comments, please contact Hamid Saebfar at (818) 717-6530, hsaebfar@dtsc.ca.gov, or Donald Owen at (916) 445-6530, dowen@dtsc.ca.gov.

Sincerely,



Trina Gonzalez
Deputy Director for
Pollution Prevention and Green Technology



PILKINGTON
NSG Group Flat Glass Business

February 14, 2011

Dr. Jeffrey Wong
Chief Scientist
Department of Toxic Substances Control
1001 "I" Street, P.O. Box 806
Sacramento, CA 95812

Re: Formal Request for Chemical Information and Analytical Test Methods for Specified Nanomaterials

Dear Dr. Wong:

This letter is a response to your letter of December 21, 2010 requesting chemical information and analytical test methods for specified nanomaterials.

Pilkington North America, Inc. (PNA) Lathrop, CA facility does not produce or import any of the nanomaterial chemicals listed in your letter. Although the Lathrop facility imports some materials containing titanium dioxide chemical, the material particle size range is approximately 10 to 250 microns, which is not anywhere near nano dimensions. PNA personnel had a phone discussion with Mr. Hamid Saebfar of DTSC on February 10, 2011. Mr. Saebfar confirmed that the requested information in your letter is for nanomaterials only, not for micron size materials.

If there are any questions on this letter, please contact Xiaosong Wang of my staff at 209 858 6311.

Sincerely,

Chris Miller
Plant Manager
PNA Lathrop Plant

Pilkington North America, Inc.
500 E. Louise Ave Lathrop, CA 95330

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POLLUTION PREVENTION
& GREEN TECHNOLOGY



PILKINGTON

Department of Toxic Substances Control
1001 '11' Street P.O. Box 206
Sacramento CA 95812