

## Sun Innovations, Inc.

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Jeffery Wong, Ph.D  
DTSC  
101 I St.  
Sacramento, CA 95812  
c.c. William Ryan & Stan Phillippe, DTSC

December 23, 2009

Dear Dr. Wong,

As a follow up to the DTSC letter to the data call in letter from this January to Hui Chem of our firm and your visit last summer, please find the questions with our answers for the data call in below:

What is the value chain for your company? For example, in what products are your carbon nanotubes used by others? In what quantities? Who are your major customers?

*• Our carbon nanotubes were mostly purchased by universities and research institutes as research materials in small quantities of less than 10 gm.*

What sampling, detection and measurement methods are you using to monitor (detect and measure) the presence of your chemical in the workplace and the environment? Provide a full description of all required sampling, detection, measurement and verification methodologies. Provide full QA/QC protocol.

*• We do not do the sampling and QA/QC control since we are a distributor. We generally re-package sealed product in a glove box to avoid inhalation. Workers have to wear nitrile gloves to avoid possible skin penetration of the nanoproducts. Free carbon nanotube powders are confined in the sealed glove box and cleaned by wet-wiping.*

What is your knowledge about the current and projected presence of your chemical in the environment that results from manufacturing, distribution, use, and end-of-life disposal?

*• We do not think the use of our carbon nanotube will impose environmental issues because we are not a manufacturer, and most of our sales are in small quantities of 1 gm or less. End-of-life disposal is basically done by our customers, who should have proper hazmat type disposal facilities in their research facilities.*

What is your knowledge about the safety of your chemical in terms of occupational safety, public health and the environment?

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*• We do not think our carbon nanotube will impose occupational safety, public health and environment problems because we are dealing very small amounts of carbon nanotubes with protection, and our company do not sell products contain carbon nanotubes except the carbon nanotubes themselves for research purposes.*

What methods are you using to protect workers in the research, development and manufacturing environment?

*• Providing proper masks to avoid inhalation or dealing it in a glovebox when dry powders are used. Using nitrile gloves to avoid possible skin penetration.*

When released, does your material constitute a hazardous waste under California Health & Safety Code provisions? Are discarded off-spec materials a hazardous waste? Once discarded are the carbon nanotubes you produce a hazardous waste? What are your waste handling practices for carbon nanotubes?

*• We don't know if carbon nanotube can be considered a hazardous waste because carbon itself is not a hazardous chemical. Since our usage and distribution of carbon nanotube are in very small quantities, we do not consider it is a hazardous waste in our case. We can collect our carbon nanotube waste in a separate sealed container and dispose it according to EPA rules, if any come into existence. Also, while public debate may occur over nanoparticles, such debate often ignores the fact that toxicity or prospective toxicity if of nano-sized matter, while nanoparticles must be carefully controlled to keep them in this state. For example, we must control them in dispersions with surfactants to prevent them from agglomerating into larger masses.*

Best Regards,

Doug Bragdon & Dr. Haorong Wang  
Sun Innovations, Inc.