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Report on E171 (titanium dioxide) and E172 (iron oxide) - analytical perspectives from research

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Five E171 grades were analysed by SEM, BET, Brookhaven XDC and CPS DC











Sample	Anatase (%)			
А	99,9			
В	99,7			
С	99,6			
D	99,1			
E	99,4			

25 E172 grades were analysed by SEM, TEM, BET, Brookhaven XDC and LD



Product Name	Colour	Crystal Phase	
Yellow 3	Yellow	Goethite FeO(OH)	
Red 2	Red	Hematite Fe ₂ O ₃	
Red 11	Red	Hematite Fe ₂ O ₃	
Black 1	Black	Magnetite Fe ₃ O ₄	

SEM results E171

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E171 is not a nano product

- SD low for E171 Manufacturer (M1, M2, M3)
- Inexperienced laboratories could find very different results



TEM vs BET Correlation x_{50} with $d_{minVSSA}$ high

700 600 500 400 300 200



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- VENATOR is the sole manufacturer of E172
- Primary particle size analysis possible for red and yellow but not for black Iron Oxides
- Rubout of crystals in a monolayer on the surface is important for accurate results
- Will be difficult to find an external lab which is able to measure Iron Oxides
- High correlation with dminVSSA



Particle Size for Risk Assessment?



Constituent Particles

- We support the EFSA approach to analyse the particle size of food additives as pristine material, in the food matrix and in biological media
- However, the guidance document is not consistent on page 21 in the evaluation of agglomeration or aggregation state by two independent methods
- Standard EM can only measure the constituent particles size and not the agglomeration or aggregation state
- The second method must corelate with EM to be a suitable screening method and the sample must be dispersed to a plateau
- Nevertheless, for many products (Black Iron Oxides) EM doesn't work and alternatives must be possible

The Nano Define decision-flow scheme for dispersion criteria on page 79 should be adjusted by the dispersion technique and mandatory correlation with EM

Mobile Particle Size for Risk Assessment Defined Dispersion Energy



- Once a material is classified as nano according the constituent particle size of the EU definition, the information on the mobile particle size under realistic conditions (food matrix, biological media, etc.) is needed.
- Dispersability has been reported as a founding base for the grouping of the nano materials" (EChA, "Appendix R.6-1 for nano materials applicable to the Guidance on QSARs and Grouping)
- The OECD TG318 for aqua toxicity could be a good base for food application, a defined dispersion energy according to NIST 1200 is recommended and indicates the particle size in aqueous media
- The same issues apply for food, what is the right dispersion energy, what is the dispersion medium, degradation, dissolution......
- An initial approach for the determination of the E171 and E172 smallest mobile particle size of the pristine material or in the food matrix is presented on the next slides

Volume weighted Particle Size

Standardised dispersion energy



Dispersion with low energy agglomerate Aggregate size is determined by the production process (page 17 line 14) aggregate Not possible to disperse **completely** to unbounded constituent particles primary particle

Particle size control of E171 and E172 by a standardised dispersion procedure:

- Comparing production dispersion energy density with laboratory scale using NIST 1200 TG
- The energy density of 240 J/ml is three times higher than normally applied in production wet milling of TiO₂
- Full redispersion of agglomerates without breaking up aggregates or constituent particles
- M. Stintz propose 270 J/ml for synthetic amorphous silica (SAS), *Powder Technology* 318 (2017) 451-458 and *Nanomaterials* 8 (2018) 454

Comparison E171/ E172

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Volume based particle sizes for risk assessment

 "Dispersibility has been reported as a founding base for the grouping of the nano materials" (EChA, "Appendix R.6-1 for nano materials applicable to the Guidance on QSARs and Grouping)





- E171 is not a nano material according the EU definition
- E172-Black Iron Oxides are not nano products
- The dispersion criteria of the Nano-Define decision-flow scheme shall be corrected for "constituent particles"
- Realistic volume based particle sizes for toxicological testing can be achieved by dispersion energies <300 J/ml</p>
- Using the NIST 1200 TG volume based particle sizes of different products can be easily compared by different laboratories
- Implementation of a dispersibility criterium in the risk assessment
- CPS DC and Brookhaven XDC are suitable instruments to measure mobile nano particles



Back Up

E172 Particle Size by Brookhaven XDC & LD VENATOR

Absolute particle size depends on the method

Dispersion Energy 240 J/ml

Same trend for both methods



E172 Nano Content by XDC & LD

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Good sensitivity for high nano contents

Brookhaven XDC is more sensitive to fine particles than LD



Long Dispersion experiment

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No complete dispersion of aggregates after 3h



more tip debris

Anatase 3h probe sonication increased tip debris aggregates still survived

some tip debris

E171 Long Dispersion experiment

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Particle size analysed by CPS DC



E171 Brookhaven XDC & CPS DC results

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High agreement between different manufacturer

Small interlaboratory SD on volume particle sizes and nano contents











VSSA E172 Screening of particle sizes and nano contents

100.0 VSSA cut off = $60 \frac{m^2}{cm^3} * \frac{D}{3}$ $dmin_{VSSA} (D^*) = \frac{2D}{VSSA}$ 91.0 90.0 Smallest dimension D= 3 spheres, 2 needles, 1 flakes 80.0 77.0 76.4 74.3 72.6 71.9 69.2 70.0 65.4 61.6 59.8 60.0 VSSA (m²/cm³) Cubes&Spheres = 60 m²/cm³ 49.6 49.3 50.0 40.8 Needles & Spheres = 50 m²/cm³ 43.6 42.9 39.0 40.0 34.2 33.3 Needles = 40 m²/cm³ 29.8 29.4 27.3 30.0 26.9 22.1 21.0 20.0 10.0 0.0 Yellow2 Yellow3 Red1 Red2 Red3 Red4 Red5 Red6 Red7 Red8 Red9 Red10 Red11 Brown1 Brown2 Brown3 Black1 Black2 Black3 Black4 Black5 **Black6** Black7 Black8 Yellow1 Yellow Black Red Brown

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According to DIN ISO 9277, samples are heated up to 180° C in 30 min and left at this temperature for one hour before determination of the SSA under Nitrogen at 5 different pressure ratios: 0,1 - 0,15 - 0,2 - 0,25 - 0,3.

The Volume Specific Surface Area (VSSA) is calculated by multiplication of the SSA with the gravity (ρ)

$$VSSA = SSA x \rho \qquad Equation 1$$

The Monodisperse Diameter of the Volume Specific Surface Area (dmin_{VSSA}) is calculated for different particle shapes by the following equation

$$dminVSSA (D^*) = \frac{2D}{VSSA}$$
 Equation 2

The VSSA cut off is calculated by the equation below.

VSSA cut off =
$$60 \frac{m^2}{cm^3} * \frac{D}{3}$$
 Equation 3

*Smallest dimension D= 3 spheres, 2 needles, 1 flakes

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Instrumentation, parameters and formulation

Company	Instrument	Detector	Disc Speed	Formulation
M-2	CPS DC	UV-Light 405nm	18000 rpm	0,1g E171, 100 ml water, 0,06 g Calgon N
M-1	Brookhaven XDC	X-Ray	3000 rpm	2g E171 in 50 ml water, 0,02 g calgon N
M -1	CPS DC	UV-Light 470nm	18000 rpm	0,1g E171, 38 ml water, 12g PDO*, 0,05 g Calgon N

Dispersion Equipment

Company	Sonic Probe	Tip Diameter	Tip Length	Eglible volume	Nominal Power
M-2	Sonoplus 2200	13 mm	250 mm	25-500 ml	750 W
M -1	Sonics VCX750	13 mm	136 mm	25-500 ml	750 W

NIST 1200 Technichal Guideline Power Calibration

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Experimental set up for the power calibration of the sonic probe

The delivered power is calculated from the equation below :

$P=dT/dt^*M^*cp$

The applied energy density is specified by setting the sample size to 50 ml, dispersion time to 5 min and dispersion power to 40 W. The energy density can be calculated using the following equation.

ED = Power * time / volume

For the defined parameters the applied energy is 240 J/ml or 67 KWh/m³.