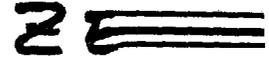




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HPV Challenge Program

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March 4, 1999

Carol M. Browner, Administrator  
U.S. Environmental Protection Agency  
PO Box 1473  
Memphis, VA 22116  
Ann: Chemical Right-to-Know Program

Dear Ms. Browner:

I am writing in response to your October 9, 1998 letter inviting Zeneca Inc.'s<sup>1</sup> participation in the HPV Challenge Program. Through our active participation in the OECD SIDS program and worldwide product stewardship activities, Zeneca continues to demonstrate its support for the voluntary assessment of chemicals and the risks associated with their manufacture and use. Consistent with this commitment and in response to your HPV Challenge, we are engaged in a chemical-by-chemical review to assess available hazard information, identify potential chemical-specific or category-based consortia opportunities, and determine what a Challenge "commitment" might entail. We hope to be in a position to make final sponsorship decisions shortly.

We would, however, like to take this opportunity to identify those "HPV chemicals" which, while listed on Zeneca's report to the 1990 Inventory Update Rule ("IUR"), are no longer manufactured or imported by the company, as a result of the closure or sale of certain business operations. Accordingly, we are not in a position to sponsor these chemicals under the HPV Challenge. These chemicals are identified in Attachment A to this letter.

Furthermore, we believe Zeneca is the sole manufacturer or importer of several other chemicals that are "no longer HPV." As evidenced by Zeneca's most recent IUR submission, these chemicals have undergone a significant decline in production since the 1990 IUR reporting cycle and are now manufactured or imported in annual quantities of substantially less than 1 million pounds. Due to changes in business operations and focus, these chemicals are not likely to resume HPV status. It is our informed belief that no other domestic entity manufactures or imports these chemicals. Thus, these chemicals, which are listed in Attachment B, do not appear to be within the scope of the HPV Challenge. We therefore respectfully request that,

<sup>1</sup> This letter is submitted on behalf of Zeneca Specialties, including Zeneca Resins; and Zeneca Agricultural Products.

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consistent with recent EPA guidance, they be removed from the HPV Challenge via an appropriate annotation on the HPV chemical list.

Ultimately, the success of the HPV Challenge will be measured, in large part, by how many companies participate and the number of chemicals that are sponsored, both individually and through categories. We strongly encourage EPA to continue to work with stakeholders like SOCMA to identify Challenge implementation approaches that will help maximize the scope of participation and the breadth of HPV toxicity information that is gathered. Zeneca supports the general concept of chemical testing embodied in the HPV Challenge Program. Our commitment to product stewardship for all of the chemicals that we manufacture and import remains strong. We will continue to assess the status of our HPV chemicals, our competitive circumstances, and the implementation structure of the Challenge as we proceed toward making final participation decisions on a chemical-by-chemical basis.

Sincerely,

A. Keith Willard  
 Chairman

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## ATTACHMENT A

*Chemicals No Longer Manufactured or Imported By Zeneca*

Chemical Name	CAS Number
Sodium dimethyl dithioic acid	26377-29-7 °
Carbonic Dichloride	75-44-5 °
Benzene sulfonic acid	98-11-3 °
2-(Hydroxymethyl)-1H-Indole-1,3-(2H)-Dione	118-29-6 °
Phosphorous Acid, triethyl ester	122-52-1 °
Ethanol Sodium salt	141-52-6 °
Diphenyl disulfide	882-33-7 °
Benzenethiol, sodium salt	930-69-8 °
phosphonochlorodithioic acid, ethyl-,o-ethyl ester	1497-68-3 °
2-Chloromethyl)-1H-Indole-1,3(2H)-dione	17564-64-6 °
1,4-Benzenedicarbonyl dichloride, 2,3,5,6-tetrachloro (Tetrachloroterephthaloyl dichloride)	719-32-4 °
Carbon Black	1333-86-4 °
Anthraquinone	84-65-1 °
Sulphanilic acid	121-57-3 °
Phosphorous Acid, trimethyl ester	121-45-9 °
Benzene Sulfonyl chloride	98-09-9 °
Diethylphosphorodithioic acid	298-06-6 °
Phosphorodithioic acid, o,o-dimethyl ester	756-80-9 °
Cyclohexane, S-isocyanato-1-(Isocyanatomethyl) 3,3-Trimethyl	4098-71-9 °
C.I. Direct Black 22	6473-13-8 °

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**ATTACHMENT B**

*Chemicals that are "No Longer HPV," Based Upon Present and Foreseeable Future Quantities and an Informed Belief that Zeneca is the Sole Manufacturer/Importer*

<b>Chemical Name</b>	<b>CAS Number</b>
Isopropyl dithio acid	107-56-2 a
Propyl chlorothioformate	13889-92-4 a
2,2,5-Trimethyl-3-(dichloroacetyl)-1,3-oxazolidine	52836-31-4 a



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