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501 Murray Road

Cincinnati, Ohio 45217-1014

Phone: (513) 242-3300

A SUBSIDIARY OF  
PMC SPECIALTIES GROUP, INC.

October 5, 1999

Mr. Charles Auer  
Office of Pollution Prevention & Toxics  
US Environmental Protection Agency (7405)  
401 M Streets, SW  
Washington, DC 20460

Reference: De-listing of an HPV chemical  
o-Anisidine, 5-methyl (CAS Number 120718)

Dear Mr. Auer:

Cincinnati Specialties, LLC is respectfully requesting that o-Anisidine, 5-methyl be de-listed from the High Production Volume (HPV) testing programs.

The market for this material is decreasing. While our historical annual production volume is more than the HPV threshold quantity of one million pounds, our current annual production volume is considerably less than the threshold quantity. Since our current production volume does not trigger inclusion in the HPV testing program, we are requesting that this material be de-listed.

Thank you in advance for taking the time to review this matter. We hope that you will agree that this material can be de-listed from the HPV program. If you have any questions, please call either Sam Ghantous at 513-482-7385 or myself at 703-847-7407.

Sincerely,

Catherine B. Rice  
*Manager, Regulatory Affairs*

cc: Sam Ghantous