



11/22  
not on HPV

AR201-11622

PMC Specialties Group, Inc.  
20525 Center Ridge Road  
Rocky River, Ohio 44116  
Phone: (440) 356-0700  
Fax: (440) 356-2787

November 22, 1999

Ms. Carol Browner, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attn.: Chemical Right-to-Know Program

NOV 23 11 11 AM '99

**RE: HPV Challenge**

Dear Ms. Browner:

PMC Specialties Group, Inc. (PMCSG) respectfully requests that 2,6-dinitro-p-cresol (CAS no. 609-93-8), a.k.a. DNPC, be removed from the HPV Challenge Program list, as it is no longer "HPV" (high production volume) and unlikely to become HPV again.

DNPC is one of several polymerization inhibitors that can be used in the production of styrene. DNPC is an old-technology product that is generally being substituted with easier to handle products and is therefore in declining use in the styrene industry. Because of this, we do not anticipate that U.S. production and import of DNPC will ever again exceed one million pounds.

It is our understanding that PMCSG is the only manufacturer or importer that reported production of DNPC in the 1990, 1994 and 1998 TSCA Inventory Updates. PMCSG has not produced DNPC in a quantity greater than one million pounds per year, the HPV threshold, since 1993. For the reasons set forth in this letter, it is our belief that 2,6-dinitro-p-cresol is "no longer HPV", is not likely to become HPV again and should be removed from the HPV list.



MR79092

Richard Walker is the PMC Specialties Group, Inc. technical contact for the HPV program as it relates to 2,6-dinitro-p-cresol. If you have any questions, comments or require additional information, he can be reached at the following address:

Richard Walker  
Chicago Specialties, LLC  
735 East 115<sup>th</sup> Street  
Chicago, IL 60628  
Phone: 773/660-4017  
Fax: 773/660-9474  
E-mail: [rickw@pmcsg.com](mailto:rickw@pmcsg.com)

Sincerely,

Rudolph E. Gulstrand, Jr.  
President, PMC Specialties Group, Inc.

cc: R. Fournier  
R. Walker  
M. Miller