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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 15 2004

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Thomas Grumbles
Manager, Product Safety and
Occupational Health
CONDEA Vista Company
900 Threadneedle
Houston, TX 77079-2990

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Dear Mr. Grumbles:

Thank you for your letter dated November 30, 1999, to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

Your letter covered several issues which are addressed below. Your commitment to sponsor an additional 63 chemicals in the HPV Challenge Program is greatly appreciated.

The first issue identified in your letter pertains to several previously reported chemicals that are impurities and therefore should not be subject to the IUR reporting requirements. Additionally your letter indicates that no other manufacturers were identified on EPA's web page for these chemicals; you requested that they also be removed from the HPV Challenge List. Those chemicals are:

- 1-tetracosanol (CAS No. 506-51-4)
- 1-hexacosanol (CAS No. 506-52-5)
- 1-octacosanol (CAS No. 557-61-9)
- 1-triacontanol (CAS No 593-50-0)

You state that these four chemicals are always present as impurities in CVC's alcohol manufacturing process. Since manufacturing processes differ among companies, EPA recommends that you amend your IUR reporting if you believe the chemicals listed above are impurities, as that term is defined under 40 CFR 710.2(m).

Concerning the removal of 1-tetracosanol (CAS No. 506-51-4), 1-hexacosanol (CAS No. 506-52-5), 1-octacosanol (CAS No. 557-61-9), and 1-triacontanol (CAS No 593-50-0), from the HPV Chemical List, these chemicals are on the HPV Chemical List because they were reported

at HPV levels under the 1990 IUR. As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website at www.epa.gov/chemrtk in March, 1999. Based on EPA's review of all the pertinent IUR data from 1998 and 2002, EPA has determined that 1-tetracosanol (CAS No. 506-51-4), 1-hexacosanol (CAS No. 506-52-5), 1-octacosanol (CAS No. 557-61-9), and 1-triacontanol (CAS No. 593-50-0) **do not meet** the "no longer HPV" criteria.

Your letter also states that ethane (CAS No. 74-84-0) is also an impurity in other substances produced by your unit. While EPA records show that ethane is a sponsored chemical in the HPV Challenge Program, if ethane is an impurity in CVC's processing, EPA encourages CVC to amend its reporting under the IUR.

Also mentioned are the following six chemicals which the letter states should be considered impurities in the ethylene manufacturing unit. They are:

- Propyne (CAS No. 74-99-7)
- Propane, 2-methyl (CAS No. 75-28-5)
- 1-butyne (CAS No. 107-00-6)
- 1-buten-3-yne (CAS No. 689-97-4)
- 1-pentene (CAS No. 109-67-1)
- 1,2-butadiene (CAS No. 590-19-2)

Using the process described above for removing chemicals that are "no longer HPV," and reviewing of all the pertinent IUR data from 1998 and 2002, EPA has determined that Propyne (CAS No. 74-99-7), 1-pentene (CAS No. 109-67-1), and 1-buten-3-yne (CAS No. 689-97-4) **do meet** the "no longer HPV criteria." The HPV Challenge Program Chemical List will be annotated by designating these chemicals with a "5" to indicate that they are "no longer HPV." Our records also reflect that CAS No. 75-28-5 is being sponsored in the HPV Challenge Program. However, an analysis of the data reflect that the two remaining chemicals have been reported on the 1998 and 2002 IUR. EPA therefore recommends that for 1-butyne (CAS No. 107-00-6) and 1,2-butadiene (CAS No. 590-19-2), CVC consider amending its reporting under the IUR.

Your letter also mentions that your company no longer manufactures or imports eight chemicals which were initially reported under the 1990 Inventory Update Rule (IUR) reporting period. Those chemicals were:

- Methane, chloro- (CAS No. 74-87-3)
- Ethylene, chloro- (CAS No. 75-01-4)
- Phthalic acid, didecyl ester (CAS No. 84-77-5)
- Ethane, 1,2-dichloro- (CAS No. 107-06-2)
- Phthalic acid, dioctyl ester (CAS No. 117-84-0)
- Xylenesulfonic acid, sodium salt (CAS No. 1300-72-7)
- ar-Toluenesulfonic acid, sodium salt (CAS No. 12068-03-0)
- Ethane, 1,2-dichloro-, manuf. of, by-products from, distn, lights (CAS No. 68608-59-3)

The Agency has received many letters from companies stating that they no longer manufacture or import HPV chemicals for which they filed reports under the 1990 IUR and which are consequently included on the HPV Challenge Program Chemical List. The Agency is posting these letters on the Chemical Right-to-Know (ChemRTK) website so that the general public and other interested stakeholders may see that specific companies are no longer associated with the manufacture or importation of a specific chemical.

Finally, your letter mentions that Residues (petroleum), steam-cracked (CAS No. 64742-90-1) and Naphtha (Petroleum), light steam-cracked (CAS No. 64742-83-2) are being reported under different CAS numbers; i.e., CAS No. 69013-21-4 versus CAS No. 64742-90-1 and CAS No. 68606-10-0 versus CAS No. 64742-83-2 and that these chemicals will be sponsored through the CMA Olefins panel. EPA has noted this change in reporting and appreciates your sponsorship of these chemicals.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at tsc-hotline@epa.gov.

Sincerely,

Wardner G. Penberthy
Acting Director
Chemical Control Division

cc: AR201