

AK2PT 11877

COOPERS CREEK CHEMICAL CORPORATION

DISTILLERS AND MANUFACTURERS

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November 30, 1999

Ms. Carol Browner, Administrator
US EPA
PO Box 1473
Merrifield, VA 22116

Dear Ms. Browner:

Coopers Creek Chemical Corporation's tar products include three materials that are considered to be high production volume chemicals. These are listed in Table No. 1. In fact, all are mixtures predominantly of chemicals currently being tested as HPV Substances. These are listed in Table No. 2.

Both Coal Tar Pitch (CAS No. 65996-93-2) and Naphthalene (CAS No. 91-20-3) are currently being evaluated in OECD SIDS programs. Another material Creosote (CAS No. 8001-58-9) is a FIFRA Regulated Substance and is being evaluated under that program. Likewise, Distillates (Coal Tar) (CAS No. 65996-92-1) are similar to Creosote and, therefore, data relevant to this material is being developed under the FIFRA Program.

We request that all the substances shown in Table No. 1 be removed from the HPV Challenge Program. As noted, most of the individual components of these products are being evaluated under the SIDS Program and Creosote is being evaluated under FIFRA.

These existing programs will provide comprehensive reviews on the pure components of these mixtures, allowing for a comprehensive understanding the Toxicology of these products.

Thank you for your help.

Sincerely,

SCOTT MORTIS
SM/epy
ext. 17

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Table No. 1 Coopers Creek HPV Coal Tar Products

Chemical	CAS #	Comments
Coal Tar Pitch	65996-93-2	OECD Sponsored
Distillates (Coal Tar)	65996-92-1	Mixture: Similar to Creosote
Creosote	8001-58-9	FIFRA Pesticide: Proposal made to remove from HPV Program

Table No. 2 Predominant Components of Various Tar Product Oils

Chemical	CAS #	Program
Anthracene	120-12-7	Similar to anthracene oil, CAS # 90640805
Quinoline	91225	Not an HPV compound
Phenol	108952	OECD compound
Cresol	95487	OECD compound
Naphthalene	91-20-3	OECD compound; see above
Methylnaphthalenes	1321944	Similar to naphthalene, CAS #91-20-3