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FORT JAMES

November 30, 1999

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

Fort James Corporation
P O Box 89
Deerfield, IL 60015-0089

telephone 847 317 5000
facsimile 847 317 5479

Dear Ms. Browner:

This letter provides a status update regarding Fort James Corporation's participation in the U. S. Environmental Protection Agency's High Production Volume (HPV) Challenge Program announced by you and Vice President Gore in October 1998.

Fort James has reviewed its Inventory Update Rule submittals for 1990 and 1994 and has found that all but two reported chemicals are either no longer being manufactured by Fort James or are being sponsored by chemical company consortia or industry groups. The status on each of these two remaining chemicals, aluminum rosinate (CAS 6178-65-9) and spent pulping liquor (CAS 66071-92-9), is described in the following paragraphs.

Aluminum Rosinate

This chemical has been reported in error in both 1990 and 1994. A letter dated August 18, 1999 from Rebecca S. Cool, Chief of the New Chemicals Prenotice Branch of EPA, to John B. Dubeck of the Law Offices of Keller and Heckman states that aluminum rosinate is exempted from the Inventory Update Rule requirement. As a result, Keller and Heckman has been pursuing the exemption of aluminum rosinate from the HPV program. Fort James anticipates that EPA will remove aluminum rosinate from the list in the near future.

Spent Pulping Liquors

Most paper companies burn their spent pulping liquor for chemical or heat recovery. The American Forest and Paper Association has been working with EPA on the exemption of spent pulping liquors from the HPV program. To date, AF&PA has not received a definitive response from EPA on the chemical and Fort James is one of several paper producing chemicals awaiting this response.

After the HPV status of all reported chemicals is known Fort James Corporation intends to make a final determination regarding our participation in the HPV program.

Very truly yours,

Eric R. Johnson

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HPV Challenge Program

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Kathleen M. Bennett
Vice President
Environment, Safety & Health

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December 15, 1998

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

Dear Ms. Browner:

Miles Marsh, Chairman and CEO of Fort James Corporation, has asked me to provide an interim response to your letter of October 1998, concerning the U. S. Environmental Protection Agency's High Production Volume (HPV) Challenge Program, as announced by you and Vice President Gore in October. Fort James views voluntary initiatives such as the HPV Challenge Program and a previous program, the 33/50 Program, as desirable alternatives to new regulations.

Fort James is evaluating its participation as an individual company or as a member of testing consortia that may be established for the pulp and paper industry. Fort James and other groups in the paper industry are currently assessing the status of the HPV substances manufactured in the pulp and paper industry. We will respond further upon completion of our review.

We recognize that sponsorship entails assembling and reviewing available test data, developing and providing test plans for each of the sponsored chemicals and where needed, conducting additional testing in the framework established by the Challenge Program. We further understand that any information and data we provide will be available to the public.

If you need anything further in the short term, please feel free to contact me.

Very truly yours,

Kathleen M. Bennett

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