



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

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OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

James E. Blum  
Product Stewardship Manager  
Industrial Specialties Division  
Rhodia Inc.  
CN 7500  
Cranbury, NJ 08512-7500

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Dear Mr. Blum:

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

Your letter requested that the Agency remove Trimer of hexamethylene diisocyanate (CAS No. 3779-63-3), and Biuret of hexamethylene diisocyanate (CAS No. 4035-89-6) from the HPV Chemical List. The names for these chemicals, as they appear on the HPV Chemical List, are Isocyanic acid, (2,4,6-trioxo-s-triazine-1,3,5(2H,4H,6H)-triy)tris(hexamethylene) ester (CAS No. 3779-63-3), and Isocyanic acid, triester with 1,3,5-tris(6-hydroxyhexyl)biuret (CAS No. 4035-89-6). However, the names reflected on the 9<sup>th</sup> Collective Index are respectively, 1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-tris(6-isocyanatohexyl)- (CAS No. 3779-63-3) and Imidodicarbonic diamide, N,N',2-tris(6-isocyanatohexyl)- (CAS No. 4035-89-6); these names will be used in the remainder of this letter. EPA is taking steps to ensure that the 9<sup>th</sup> Collective Index names are also used on the HPV Chemical List and requests that companies use the 9<sup>th</sup> Collective Index name whenever possible.

Your request was based on your determination, with EPA guidance, that these chemicals are classified as polymers, and should be exempt from Inventory Update Rule (IUR) reporting. Your letter indicates that beginning in the early 1990's Rhodia (then Rhone-Poulenc) began questioning the proper classification of these materials. Similar products manufactured by other companies were described differently, resulting in confusion. Rhodia's material safety data sheets (MSDS's) for these materials contained an alternate description of "polymeric hexamethylene diisocyanate" (CAS No. 28182-81-2).

Rhodia then sought EPA guidance on the nomenclature issue in order to finally resolve the matter. EPA's reasons, dated February 24, 1998, confirmed that the polymeric description of

these materials is appropriate “if one’s commercial intent is to manufacture a polymer.” You have indicated that Rhodia’s intent was, and remains, to manufacture polymeric material and that therefore these two materials should be removed from the HPV Chemical List because these materials were in fact exempt from IUR reporting in 1990, 1994, and 1998.

We have reviewed your request and have determined that 1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-tris(6-isocyanatohexyl)- (CAS No. 3779-63-3) and Imidodicarbonic diamide, N,N',2-tris(6-isocyanatohexyl)- (CAS No. 4035-89-6) **are not** considered polymers for purposes of the Toxic Substances Control Act (TSCA). If one’s commercial intent is to manufacture a polymer the substance should be referred to as Hexane, 1,6-diisocyanato-, homopolymer (CAS No. 28182-81-2) as indicated in your letter. Therefore, 1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-tris(6-isocyanatohexyl)- (CAS No. 3779-63-3) and Imidodicarbonic diamide, N,N',2-tris(6-isocyanatohexyl)- (CAS No. 4035-89-6), are reportable under the IUR and have been properly included on the HPV Chemical List. If the reporting is incorrect, EPA encourages Rhodia to re-evaluate its reporting under the IUR.

1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-tris(6-isocyanatohexyl)- (CAS No. 3779-63-3) and Imidodicarbonic diamide, N,N',2-tris(6-isocyanatohexyl)- (CAS No. 4035-89-6), 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](http://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 1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-tris(6-isocyanatohexyl)- (CAS No. 3779-63-3) and Imidodicarbonic diamide, N,N',2-tris(6-isocyanatohexyl)- (CAS No. 4035-89-6) **do not meet** the no longer HPV criteria.

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 [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201