



AR 201-12031

PPG Industries, Inc. One PPG Place Pittsburgh, Pennsylvania 15272

James A. Barter, Ph.D.  
Director, Environmental Health Sciences  
Environment, Health & Safety  
Chemicals  
Phone: 412-434-2801  
Fax: 412-434-3193

REGISTERED MAIL  
RETURN RECEIPT REQUESTED

November 30, 1999

Ms. Carol Browner  
US EPA  
PO Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to- Know Program

99 DEC 17 AM 11:19

RECEIVED  
U.S. ENVIRONMENTAL  
PROTECTION AGENCY

Dear Ms. Browner:

As you know, PPG Industries, Inc. has agreed to participate in the voluntary HPV Challenge Program and notified the Agency of our intent to do so in a letter to Carol Browner dated March 11, 1999. In our commitment letter, we agreed to sponsor all chemicals that are currently manufactured or imported by PPG and met the criteria for inclusion in the HPV Challenge Program.

The purpose of this letter is to clarify the rationale for PPG Industries not sponsoring certain other chemicals on the HPV Challenge Chemical List for which PPG is designated as a manufacturer or importer. There are 52 HPV chemicals that are listed as being associated with PPG for the 1990 reporting period of the Inventory Update Rule (IUR). As stated above, PPG initially committed to sponsor all of the chemicals on the list that PPG currently manufactures or imports. In our initial commitment letter, PPG withheld commitment to sponsor two materials: phosgene (CAS No. 75-44-5) and diisopropyl peroxydicarbonate (CAS No. 105-64-6). PPG now agrees to sponsor these two materials. In addition, PPG has agreed to sponsor one chemical that was not associated with PPG for the 1990 reporting period of the IUR, i.e. meta-dichlorobenzene (CAS No. 541-73-1). Four additional chemicals on the HPV List that PPG currently manufactures are being sponsored through the OECD SIDS program. With regard to the remaining chemicals on the HPV List associated with PPG, there are 25 chemicals that are no longer manufactured or imported by PPG due to divestiture of certain businesses. As a result, PPG does not feel obligated to sponsor these chemicals that are no longer manufactured or imported by our facilities.

MR29995

Ms. Carol Browner  
Page Two  
November 30, 1999

In order to clarify which chemicals are being sponsored and which chemicals have been divested by PPG, we have attached a Table that contains all of the chemicals that are listed on the EPA website as being associated with PPG for the 1990 IUR period. In this Table, we have identified those chemicals that PPG has agreed to sponsor, either individually or as part of a consortium. We have also identified those chemicals that are no longer relevant for PPG, due to divestiture of businesses. We expect that the Agency will incorporate this information in whatever process EPA plans to utilize to inform other stakeholders that PPG has no responsibility for these materials in the HPV Challenge Program. We feel that it is important for the Agency to do this, since the commitments and progress of each company toward achieving the goals of the program will be tracked by a variety of stakeholders. Accurate tracking of these commitments can be accomplished only if correct information on what companies are involved with a particular chemical is available on the web site.

Please contact me at 412-434-2801 if the Agency has any questions about PPG's participation in this program.

Yours truly,

James A. Barter

**Chemicals on EPA's HPV Challenge List Associated with PPG Industries, Inc.**

<b>CAS Number</b>	<b>Chemical</b>	<b>IUR Year</b>	<b>Sponsorship Status by PPG</b>
71556	Ethane, 1,1,1-trichloro	1990	Sponsored <sup>1</sup>
75003	Ethane, chloro-	1990	Sponsored
75014	Ethylene, chloro-	1990	Sponsored <sup>2</sup>
75150	Carbon disulfide	1990	Being handled under SIDS
75354	Ethylene, 1,1-dichloro-	1990	Sponsored <sup>1</sup>
75445	Phosgene	1990	Sponsored <sup>3</sup>
79016	Ethylene, trichloro-	1990	Being handled under SIDS
79221	Formic acid, chloro-, methyl ester	1990	Sponsored <sup>4</sup>
87816	Benzene, 1,2,3-trichloro-	1990	Sponsored <sup>5</sup>
93834	Oleamide, N,N-bis(2-hydroxyethyl)-	1990	PPG divested this product line
95501	Benzene, o-dichloro-	1990	Sponsored <sup>5</sup>
102603	2-Propanol, 1,1',1'',1'''-(ethylenedinitrio)tetra-	1990	PPG divested this product line
105646	Peroxydicarbonic acid, diisopropyl ester	1990	Sponsored <sup>6</sup>
106467	Benzene, p-dichloro-	1990	Being handled under SIDS
106752	Formic acid, chloro-, oxydiethylene ester	1990	Sponsored <sup>4</sup>
107062	Ethane, 1,2-dichloro-	1990	Sponsored <sup>2</sup>
108236	Formic acid, chloro-, isopropyl ester	1990	Sponsored <sup>4</sup>
108907	Benzene, chloro-	1990	Sponsored <sup>5</sup>
111604	Stearic acid, 2-hydroxyethyl ester	1990	PPG divested this product line
122190	Ammonium, benzyl-dimethyloctadecyl-, chloride	1990	PPG divested this product line
127184	Ethylene, tetrachloro-	1990	Being handled under SIDS
142223	Carbonic acid, oxydiethylene diallyl ester	1990	Sponsored <sup>7</sup>
156805	Ethylene, 1,2-dichloro-, (E)-	1990	Sponsored
501531	Formic acid, chloro-, benzyl ester	1990	Sponsored <sup>4</sup>
541413	Formic acid, chloro-, ethyl ester	1990	Sponsored <sup>4</sup>
760678	Hexanoyl chloride, 2-ethyl-	1990	Sponsored <sup>4</sup>
822162	Stearic acid, sodium salt	1990	PPG divested this product line
1152610	Aspartic acid, N-carboxy-, N-benzyl ester, L-	1990	Sponsored
1323393	Octadecanoic acid, monoester with 1,2-propanediol	1990	PPG divested this product line
1338392	Sorbitan, monolaurate	1990	PPG divested this product line
1338416	Sorbitan, monostearate	1990	PPG divested this product line
1338438	Sorbitan, monooleate	1990	PPG divested this product line
1592230	Stearic acid, calcium salt	1990	PPG divested this product line
1843205	Dodecylamine, N,N-dimethyl-, N-oxide	1990	PPG divested this product line
3282302	Pivaloyl chloride	1990	Sponsored <sup>4</sup>
4300974	Propanoyl chloride, 3-chloro-2,2-dimethyl-	1990	Sponsored <sup>4</sup>
8007430	Sorbitan, sesquioleate	1990	PPG divested this product line
24468131	Carbonochloridic acid, 2-ethylhexyl ester	1990	Sponsored <sup>4</sup>
26266580	Sorbitan, trioleate	1990	PPG divested this product line
27323417	Benzenesulfonic acid, dodecyl-, compd. with 2,2',2''-nitrotris[ethanol] (1:1)	1990	PPG divested this product line
39464705	Poly(oxy-1,2-ethanediyl), .alpha.-phenyl-.omega.-hydroxy-, phosphate	1990	PPG divested this product line
40292828	Neodecanoyl chloride	1990	Sponsored <sup>4</sup>
61789320	Fatty acids, coco, 2-sulfoethyl esters, sodium salts	1990	PPG divested this product line
61789400	1-Propanaminium, 3-amino-N-(carboxymethyl)-N, N-dimethyl-, N-coco acyl derivs., inner salts	1990	PPG divested this product line
67784774	Quaternary ammonium compounds, bis(hydroxyethyl)methyltallow alkyl, chlorides	1990	PPG divested this product line
68140001	Amides, coco, N-(hydroxyethyl)	1990	PPG divested this product line
68140012	Amides, coco, N-[3-(dimethylamino)propyl]	1990	PPG divested this product line
68308678	Quaternary ammonium compounds, ethyldimethylsoya alkyl, Et sulfates	1990	PPG divested this product line
68424851	Quaternary ammonium compounds, benzyl-C12-16-alkyldimethyl, chlorides	1990	PPG divested this product line
68603429	Amides, coco, N,N-bis(hydroxyethyl)	1990	PPG divested this product line
68954074	Boric acid, reaction products with diethanolamine	1990	PPG divested this product line
73467773	Poly[oxy(ethyl-1,2-ethanediyl)], .alpha.-(chlorocarbonyl)-.omega.-(tetrapropylenephenoxy)-	1990	PPG divested this product line

<sup>1</sup>Halogenated Solvents Industry Alliance

<sup>2</sup>CMA Vinyl Chloride Health Comm.

<sup>3</sup>CMA Phosgene Panel

<sup>4</sup>To Be Determined

<sup>5</sup>Chlorobenzene Producers Assoc.

<sup>6</sup>Society of the Plastics Industry Inc.

<sup>7</sup>With Akzo Nobel Chemicals