



DuPont Dow elastomers

DuPont Dow Elastomers L. L. C.
Pontchartrain Site
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cc: Charles Auer, EPA

AR 201-12201

January 5, 2000

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

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DuPont Dow Elastomers L.L.C. (DuPont Dow) manufactures seven chemicals listed on EPA's Chemical Right to Know, HPV Challenge voluntary testing program. Three of these chemicals, **2-chloro-1,3-butadiene (CAS # 126998)**, **2,3,4-trichloro-1-butene CAS # 2341507** and **3,4-dichloro-1-butene CAS # 760236** are currently listed for testing under OECD-SIDS as indicated in the EPA's HPV listing.

DuPont Dow previously requested that two of the remaining four chemicals, **cis- and trans-1,4-dichloro-2-butene (CAS # 1476115 & CAS #110576)** be delisted and replaced by a single non-separated **1,4 dichloro-2-butene mixture (CAS #764410)**. DuPont Dow manufactures only the mixture and does not separate the stereo-isomers before they are converted to another material.

On March 12, 1999 DuPont Dow volunteered to sponsor the previously mentioned **1,4-dichloro-2-butene mixture (CAS #764410)**, as well as **2,3-dichloro-1,3-butadiene (CAS # 1653196)** and **1,3-dichloro-2-butene (CAS # 926578)** under the HPV Challenge Program. DuPont Dow did that as the only US representative of consortiums sponsored by the International Institute of Synthetic Rubber Producers (IISRP). In June 1999, IISRP formally committed to sponsoring these same three chemicals under the HPV Challenge Program on behalf of these same consortiums. These consortiums are also collaborating on the three chemicals listed for testing under OECD-SIDS.

At the latest meeting of IISRP's chloroprene Scientific Oversight Committee (SOC), which will oversee and coordinate data generation and collection for all six chemicals, we agreed that reports on all future data will be done in English. However, there is a significant body of information that already exists on these chemicals. Since some of this work was done in non-English speaking countries, the background data, such as lab reports, may not be in English. Is that acceptable? Or does all information, including background data, have to be submitted in English?

Sincerely,

Michael A. Lynch
Chairman
Chloroprene S.O.C.