



AR 201 12284

Plastic Chemical Products

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November 24, 1999

Mr. Charles M. Auer, Director  
Chemical Control Division (7405)  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
401 M Street, S.W. – Room E403C  
Washington, D.C. 20460

**Re: Phenol, methyl-, sodium salt (CASNR 34689-46-8)  
Removal from the HPV Chemical List**

Dear Mr. Auer:

Merichem Chemicals & Refinery Services LLC ("Merichem") requests the removal of the above-identified chemical substance from the High Production Volume (HPV) list of chemicals. EPA initially placed this chemical substance on the HPV list in reliance on an erroneous 1990 and 1994 Inventory Update Rule ("IUR") report submitted by Merichem. The IUR reports were submitted by Merichem to reflect the importation of a spent caustic material, which Merichem utilizes as a feedstock in its chemical production facilities in Houston, Texas. Merichem also purchases this same material from a number of refiners in the United States, for which no IUR report was due, since the refiners filed such IUR reports as the manufacturer of the material.

The petroleum refiners in the US reported the production of this chemical substance as "Phenols, sodium salts, mixed with sulfur compounds, gasoline alk. scrubber residues," CASNR 68988-99-8. This is the description and CASNR which Merichem should have used, but inadvertently did not. Merichem was the only company to report the production or import of this chemical substance under the above mentioned CASNR on the IUR report forms. The U.S. Environmental Protection Agency (EPA) has recognized that inadvertent reporting mistakes of this type are a "common error." If Merichem had not



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incorrectly reported this chemical substance using this CASNR, then this CASNR entry would not be on the HPV Chemical List in the first place.

As a result, EPA has no basis on which to leave "Phenol, methyl-, sodium salt," CASNR 34689-46-8 on the HPV Chemical list. Merichem requests that the EPA delist this chemical substance, thereby removing it from the HPV Chemical List and the HPV Challenge Program.

Merichem will in the future use the correct CASNR 68988-99-8 for this material as is used by the refining producers in the United States.

We would also point out that Merichem is a participant in the American Petroleum Institute (API) Petroleum HPV Testing Group, which will be sponsoring "Phenols, sodium salts, mixed with sulfur compounds, gasoline alk. scrubber residues," CASNR 68988-99-8 in its Reclaimed Substances Test Plan.

We look forward to your response and invite any questions that you may have about this matter.

Sincerely,

MERICHEM CHEMICALS & REFINERY SERVICES LLC

Paige Luckie  
Environmental Manager