

CYTEC

AR 201-12494

CYTEC INDUSTRIES INC.
Five Garret Mountain Plaza
West Paterson, NJ 07424
Tel:(973)357-3100

March 7, 2000

The Honorable Carol M. Browner
Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

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2000 MAR 21 PM 12:46

Dear Ms. Browner:

I am writing in response to the Environmental Protection Agencies request that individual chemicals (i.e. those HPV chemicals not proposed for testing in a category) that require further testing on animals be deferred until November 2001. This request was made after Cytec Industries Inc. responded to the HPV challenge program with a letter on July 7, 1999 voluntarily agreeing to participate. At that time Cytec volunteered 2-hydroxy-4-(octaloxo)-benzophenone, CAS # 1843-05-6, with assessments to commence in 2000. However, based on requests of the EPA in the October 14, 1999 letter to Manufacturers/Importers we would like to defer the commencement of assessments for this material until November 2001.

In addition, on November 22, 1999 we submitted a supplementary letter volunteering an additional twenty chemicals either on our own or as part of consortia. In that letter we brought forth outstanding issues on four chemicals, two of which should be removed from the HPV list and two which Cytec no longer manufactures or imports. The specific information on these is provided below. As of the date of this letter we have not heard from EPA regarding these chemicals.

No Longer HPV:

1. ***Benzophenone, 2,4-hydroxy-*** (CAS# 131-56-6): This material is a non-isolated intermediate in our processes. This process change was implemented in 1995 as evidenced by a zero quantity reported by Cytec to the EPA IUR in 1998. We do not anticipate that this material

will become an isolated material, a manufactured material, or an imported material in the future for Cytec. Therefore, Cytec Industries Inc. does not plan to sponsor this material in the HPV Challenge Program as we believe this material should no longer be considered an HPV chemical.

2. *Carbamic acid, ethylthio-, O-isopropyl ester (CAS# 141-98-0):* The status of the manufacturing and importing of this material has changed considerably since 1990. There were essentially 3 users of this chemical in the US. In August 1999 one ceased operations and a second company has verified that it is converting to a new process, which will not use this material. This will eliminate virtually all of the product imported into the US except for an anticipated quantity of 40,000 lbs./year. In addition, the only other manufacturer in 1990 was Minerec who not longer operates. This makes Cytec the only importer and manufacturer left in the US who submitted in the original 1990 IUR listing. Because there are no more large mines opening in the US in the foreseeable future, there is little chance that this product will be used to any large extent again. Therefore, we believe this material should no longer be considered an HPV chemical.

No Longer a Cytec Product and/or Import:

1. *Benzophenone, 2-hydroxy-4-methoxy- (CAS# 131-57-7):* This material is no longer manufactured or imported by Cytec, nor is it anticipated that this material will be manufactured or imported by Cytec in the future as evidenced by a zero quantity reported by Cytec to the EPA IUR in 1998.
2. *1,6-Hexanediamine, N, N'-bis (2,2,6,6-tetramethyl-4-piperidiny)- (CAS# 61260-55-7):* This material is no longer imported by Cytec, nor is it anticipated that this material will be manufactured or imported by Cytec in the future. Although we imported material in 1997, as reported in the 1998 IUR, since that time we have not imported this material.

If you have any questions or wish further information do not hesitate to contact me at 973-357-3347.

Regards,

Joseph Caporossi
Director, Safety, Health & Product Regulatory Compliance

CYTEC

AR-201

CYTEC INDUSTRIES INC.
 Five Garret Mountain Plaza
 West Paterson, NJ 07424
 Tel:(973)357-3100

November 22, 1999

The Honorable Carol M. Browner
 Administrator
 U.S. Environmental Protection Agency
 401 M Street, SW
 Washington D.C., 20460

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 OPT/MCIC
 1999 DEC -9 PM 3:12

Dear Ms. Browner:

In response to your request for Cytec Industries Inc. to participate in the HPV challenge program, Cytec responded with a letter on July 7, 1999 voluntarily agreeing to participate. Since that time, we have been reviewing the list of HPV chemicals. Based on this review, we are pleased to inform that we voluntarily agree to independently sponsor the six additional chemicals listed below. We have already volunteered 2-hydroxy-4-(octaloxo)-benzophenone, CAS # 1843-05-6, with assessments to commence in 2000.

HPV Chemicals Sponsored Solely by Cytec Industries

	Chemical Name	CAS Number	Submit Test Plan	Consortium
1	1,3,5-Triazine-2,4,6(1H,3H,5H)-trione, 1,3,5-tris-O,O-4-(1,1-dimethylethyl)-3-hydr	40601-76-1	2003	None
2	Phenol, 6-tert-butyl-3-(chloromethyl)-2,4-dimethyl-	23500-79-0	2003	None
3	Butanenitrile, 2-amino-2,3-dimethyl	13893-53-3	2001	None
4	Isocyanic acid, m-phenylenediiso-propylidene	2778-42-9	2002	None
5	Melamine, hexakis(methoxymethyl)-	3089-11-0	2001	None
6	Phosphorodithioic acid, O,O-ditolyl ester	27157-94-4	2003	None

Also, we voluntarily sponsor the fourteen (14) chemicals below as part of consortia of which Cytec is a member.

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Thioesters Association, REGNET			
Chemical Name	CAS Number	Submit Test Plan	Consortium
Propionic acid, 3,3' thiodi-, didodecyl ester	123-28-4	2001	Thioesters Association
Propionic acid, 3,3' thiodi-, dioctadecyl ester	693-36-7	2001	Thioesters Association
Propionic acid, 3,3' thiodi-, ditridecyl ester	10595-72-9	2001	Thioesters Association
Propionitrile, 3,3' thiodi-	111-97-7	2002	Thioesters Association

Sulfosuccinates Association, SOCMA			
Chemical Name	CAS Number	Submit Test Plan	Consortium
Succinic acid, sulfo-, 1,4-dicyclohexyl ester, sodium salt	23386-52-9	2001	Sulfosuccinates Association
Succinic acid, sulfo-, 1,4-bis(1,3-dimethylbutyl) ester, sodium salt	2373-38-8	2001	Sulfosuccinates Association
Succinic acid, sulfo-, 1,4-bis(2-ethylhexyl)ester, sodium salt	577-11-7	2001	Sulfosuccinates Association

Phenolic Benzotriazoles Association, SOCMA			
Chemical Name	CAS Number	Submit Test Plan	Consortium
2-(2'-hydroxy-5'-octylphenyl) benzotriazole	3147-75-9	2001	Phenolic Benzotriazoles Association
2-(2'-hydroxy-3',5'-di-t-amylphenyl) benzotriazole	25973-55-1	2001	Phenolic Benzotriazoles Association
2-(2'-hydroxy-5'-methylphenyl) benzotriazole	2440-22-4	2001	Phenolic Benzotriazoles Association

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Aliphatic Esters Panel, CMA

Chemical Name	CAS Number	Submit Test Plan	Consortium
Maleic acid, bis (1,3-dimethylbutyl)ester	105-52-2	2001	Aliphatic Esters Panel
Maleic acid, bis(2-ethylhexyl)ester	142-16-5	2001	Aliphatic Esters Panel

NMA/NBMA Consortia, SRA International

Chemical Name	CAS Number	Submit Test Plan	Consortium
Acrylamide, N-(hydroxymethyl)-	924-42-5	2000	NMA/NBMA Consortium
Acrylamide, N-(butyoxymethyl)-	1852-16-0	2000	NMA/NBMA Consortium

Based on our review, we would like to bring to your attention four (4) additional chemicals, two of which should be removed from the HPV list and two which Cytec no longer manufactures or imports.

No Longer HPV:

- 1. Benzophenone, 2,4-hydroxy- (CAS# 131-56-6):*** This material is a non-isolated intermediate in our processes. This process change was implemented in 1995 as evidenced by a zero quantity reported by Cytec to the EPA IUR in 1998. We do not anticipate that this material will become an isolated material, a manufactured material, or an imported material in the future for Cytec. Therefore, Cytec Industries Inc. does not plan to sponsor this material in the HPV Challenge Program as we believe this material should no longer be considered an HPV chemical.
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If you have any questions or wish further information about Cytec's Product Stewardship Program, please contact the following individual.

Joseph Caporossi
Director, Safety, Health & Product Regulatory Compliance
Telephone 973-357-3347

Regards,

J. D. Leman
Vice President
Manufacturing and Research Services

12/8/00
EAD