

201-15528



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

JUN 30 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dr. Wm. Claude White  
Lyondell Chemical Company  
One Houston Center  
P. O. Box 3646  
Houston, Texas 77253-3646

Dear Dr. White:

Thank you for your letter dated August 13, 2002 to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program. We apologize for the delay in responding.

Your letter requests that Isocyanic acid, (2,4,6 - trioxo-s-triazine- 1,3,5, (2H, 4H, 6H)-triy) tris(hexamethylene) ester (CAS No. 3779-63-3) be changed to no longer HPV.

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK)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 ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) in March 1999. Among the prerequisites to be considered for removing a chemical from the HPV Challenge Program is that the chemical does not meet Inventory Update Rule (IUR) reporting requirements for the two most recent reporting years, in this case 1998 and 2002. As stated in your letter, Arco Chemical reported this chemical in 1998, as did Lyondell in reporting year 2002. Therefore, EPA has determined that Isocyanic acid, (2,4,6 - trioxo-s-triazine- 1,3,5, (2H, 4H, 6H)-triy) tris(hexamethylene) ester (CAS No. 3779-63-3) does not meet the no longer HPV criteria.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. The posting of your letter will serve as a means of advising the general public and interested parties that Akzo Nobel no longer sponsors, manufactures or imports this chemical. 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 [tsc-hotline@epa.gov](mailto:tsc-hotline@epa.gov).

Sincerely,

Wardner G. Penberth,  
Acting Director  
Chemical Control Division

cc: AR201

04 AUG 25 PM 1:13  
RECEIVED