

AR201-13916



Jodi Burgess

08/30/2002 01:28 PM

To: NCIC OPPT/DC/USEPA/US@EPA, Jodi Burgess/DC/USEPA/US@EPA, NCIC HPV@EPA

cc:

Subject: CASRN :115-83-3: No Longer Hercules HPVC Chemical



RHartgrove@Herc.com

07/19/02 03:10 PM

To: Karen Hoffman/DC/USEPA/US@EPA

cc:

Subject: CASRN :115-83-3: No Longer Hercules HPVC Chemical

RECEIVED
OPPT/NCIC
2002 SEP -3 PM 12:15

Sorry,

I entered you address incorrectly.

Woody

----- Forwarded by R. Woodson Hartgrove/Plaza/NA/Herc on 07/19/02 03:14 PM -----

R. Woodson
Hartgrove

07/19/02
02:30 PM

To: Karen.hoffman@epamail.epa.gov

cc: Gary L.

McCallister/Plaza/NA/Herc@Hercules,
john_morris@americanchemistry.com

Subject: CASRN :115-83-3: No

Longer

Hercules HPVC Chemical

Karen,

Thanks for your help last week with our HPVC commitment to three aliphatic esters and your advise as to how we should proceed to make a case that CASRN: 115-83-3 is not actually an HPVC chemical.

Mac McCallister, our Regulatory Affairs Manager and my boss has drafted the note below to you and I am forwarding it through my e-mail address. We hope this is what you had in mind for us to submit.

Regards,

Woody Hartgrove
currently at 302-594-7126

July 19, 2002

Karen,

As stated previously in an April 12, 2002 e-mail to you, Hercules Incorporated wishes to rescind its HPVC commitment to pentaerythritol tetrastearate CASRN: 115-83-3. Further we wish to challenge the EPA to reassess whether this chemical is actually an HPVC chemical

Hercules' production for this chemical has been less than 30,000 for all IUR to date; insufficient to justify the HPVC listing. We have tried to

locate others who manufacture this chemical through our participation in the ACC Aliphatic Esters Panel and have found none.

Hercules Incorporated is not in a position to support this chemical unilaterally, nor do we feel we should support it unilaterally since we manufacture such small volumes relative to the 1 million-pound HPVC chemical threshold. We respectfully request the EPA to either remove this chemical from the HPVC list or identify manufactures with which Hercules Incorporated might form a consortium to address this chemical under HPVC

If you have questions, please call either Woody Hartgrove (302-995-3490) or me (302-995-3406) or contact us by e-mail.

Sincerely,

G. L. McCallister
Manager, Regulatory Affairs and Toxicology
Hercules Incorporated

PS: We are moving office week of July 29. The phone numbers above are active as of July 31.