

**Honeywell**

Honeywell  
P.O. Box 1139  
Morristown, NJ 07962-1139

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2002 NOV -8 AM 10: 52  
October 22, 2002

Ms. Christine Whitman, Administrator  
U.S. EPA  
PO Box 1473  
Merrifield, VA 22116

Re: HPV Challenge Program  
Company Identification :

Dear Ms. Whitman:

Mr. James Keith of the American Chemistry Council recently contacted me regarding the HPV status of five of our Coal Tar Products. I informed Mr. Keith that Honeywell (formerly known as AlliedSignal) had submitted a letter to Ms. Browner in 1999 requesting that these and five similar materials be dropped from the HPV list for several reasons. He was also told that we, Honeywell, had never received a response to that letter. It now appears that some of these chemicals are being listed as "unsponsored".

It was Mr. Keith's recommendation that we resubmit this letter to EPA. I am therefore resubmitting a copy of our original letter and a copy of the updated information we supplied to ACC.

Honeywell has been and continues to be supportive of the HPV program. To this end, we, with our partners, have already submitted commitments for 24 substances and have filed SIDS dossiers on 14 of these (6 under API). Should there be any questions regarding the Coal Tar Products, please direct them to Mr. Samuel Visnic, the product steward, for these substances (Honeywell International, 101 Columbia Road, Morristown, NJ 07962, telephone: 973-455-5908, e-mail [samuel.visnic@honeywell.com](mailto:samuel.visnic@honeywell.com)) or to me.

Sincerely,

George M. Rusch, Ph.D., DABT, FATS  
Director of Toxicology and Risk Assessment

Cc: Mr. Samuel Visnic, Honeywell  
Mr. James Keith, ACC

Enc.

Honeywell  
P.O. Box 1139  
Morristown, NJ 07962-1139

August 19, 2002

Mr. James Keith  
American Chemistry Council  
1300 Wilson Blvd  
Arlington, VA 22209

Subject: HPV program - "Orphan" Chemicals

Dear Mr. Keith,

On November 30, 1999, Honeywell sent EPA a letter requesting that 10 of our products be dropped from the HPV list. To date, we have not received a response to that letter. Five of those materials appear on the recent "orphan" list that you sent Honeywell. Of those five, we no longer produce three and will not be participating in the development of SIDS dossiers on them. For the other two, our arguments for not testing them remains unchanged.

We have enclosed a copy of the 1999 letter to Ms. Browner for your information as well as an updated summary of Honeywell's Coal Tar Products. If you have any questions, please call me (973-455-3672) or Mr. Samuel Visnic (973-455-5908).

Sincerely,

George M. Rusch, Ph.D., DAB<sup>1</sup>, FATS  
Director of Toxicology and Risk Assessment

Cc: Mr Sam Visnic

Revised 8/12/02

**Table 1 Honeywell HPV Coal Tar Products**

Chemical	CAS #	Comments	HPV "Orphan"
Coal tar, high temperature	65996-89-6	Mixture: Similar to CAS # 8007-45-2, previously sponsored in HPV program	X
Solvent naphtha	65996-79-4	No longer manufactured by Honeywell	
Coal tar oil	65996-82-9	Mixture: Predominant components are naphthalene & phenol	
Extracts, coal tar oil alkaline	65996-83-0	No longer manufactured by Honeywell	X
Coal tar oil alkaline extract residue	65996-87-4	No longer manufactured by Honeywell	X
Coal tar upper distillate	65996-91-0	Mixture: Similar to creosote (FIFRA pesticide)	X
Coal tar pitch	95996-93-2	OECD sponsored	
Extract residues, coal tar oil alkaline, naphthalene distillation residues	73665-18-6	No longer manufactured by Honeywell	X
Creosote	8001-58-9	FIFRA pesticide; proposal made to remove from HPV program	
Naphthalene	91-20-3	OECD sponsored; No longer manufactured by Honeywell	

**Table 2 Predominant Components of Various Tar Product Oils**

Chemical	CAS #	Program
Phenol	108-95-2	OECD compound
Naphthalene	91-20-3	OECD compound; see above



AlliedSignal Inc.  
P.O. Box 1057  
Morristown, NJ 07962-1057

November 30, 1999

Ms. Carol Browner, Administrator  
US EPA  
PO BOX 1473  
Merrifield, VA 22116

Company Identification

Dear Ms. Browner:

AlliedSignal's tar products include 10 materials that are considered to be High Production Volume (HPV) chemicals. These are listed in Table 1. In fact, all are mixtures predominantly of chemicals currently being tested as HPV substances. These are listed in Table 2. The one material which is unique to our coal tar products is coal tar, high temperature (CAS# 65996-89-6) itself, the feedstock. This material is essentially the same as coal tar (CAS # 8007-45-2) which is currently being sponsored by FMC Corp. We will share all of our existing data with FMC Corp. to assist them in developing the SIDS dossier and summary. Both coal tar pitch (CAS # 95996-93-2) and naphthalene (CAS # 91-20-3) are currently being evaluated in OECD SIDS programs. Another material, creosote (CAS #8001-58-9) is a FIFRA regulated substance and is being evaluated under that program. Likewise, coal tar upper distillate (CAS #65996-91-0) is similar to creosote and, therefore, data relevant to this material are being developed under the FIFRA program.

The other materials, solvent naphtha (CAS #65996-79-4), coal tar oil (CAS # 65996-82-9), extracts coal tar oil, alkaline (CAS # 65996-83-0), coal tar oil alkaline extract residue (CAS #.65996-87-4), and extract residues, coal tar oil alkaline, naphthalene distillation residues (CAS # 73665-18-6) are all derived from coal tar and contain the same components as coal tar. We request that these five substances as well as coal tar, high temperature (CAS# 65996-89-6) and the two FIFRA related materials (CAS # 8001-58-9 and CAS # 65996-91-0) be removed from the HPV Challenge program. As noted above, most of the individual components of these products are themselves being evaluated under the SIDS program; coal tar, high temperature is being sponsored under the HPV initiative; naphthalene and coal tar pitch are in the OECD program; and creosote is being evaluated under FIFRA. These existing programs will provide comprehensive reviews on both the feedstock and the pure components of these mixtures, allowing for a comprehensive understanding of the toxicology of these products.

We look forward to working with EPA on this initiative. The AlliedSignal contact for this program is Mr. Sam Visnic; his address is given below. Should you have any questions, please call Mr. Visnic or me.

Sincerely,

George M. Rusch, Ph.D., DABT  
Director, Toxicology & Risk Assessment

Attachment

cc: J. Stephens  
S. Visnic  
S. Ratcliff

Mr. Sam Visnic, AlliedSignal Inc., 101 Columbia Rd., Morristown, NJ 07962  
Tel: 973-455-5908; Fax: 973-455-5722; e-mail: [samuel.visnic@alliedsignal.com](mailto:samuel.visnic@alliedsignal.com)

**Table 1 AlliedSignal HPV Coal Tar Products**

Chemical	CAS #	Comments
Coal tar, high temperature	65996-89-6	Feed stock – similar to CAS # 8007-45-2, previously sponsored in HPV program
Solvent naphtha	65996-79-4	Mixture: Predominant component is naphthalene.
Coal tar oil	65996-82-9	Mixture: Predominant components are naphthalene & phenol
Extracts, coal tar oil alkaline	65996-83-0	Mixture: Predominant components are sodium salts of phenol & cresol, quinoline, & sodium hydroxide
Coal tar oil alkaline extract residue	65996-87-4	Mixture: Similar to CAS # 65996-82-9 (above)
Coal tar upper distillate	65996-91-0	Mixture: Similar to creosote (FIFRA pesticide)
Coal tar pitch	95996-93-2	OECD sponsored
Extract residues, coal tar oil alkaline, naphthalene distillation residues	73665-18-6	Mixture: Predominant components are 1 & 2-methylnaphthalene, quinoline, & anthracene
Creosote	8001-58-9	FIFRA pesticide; proposal made to remove from HPV program
Naphthalene	91-20-3	OECD sponsored

**Table 2 Predominant Components of Various Tar Product Oils**

Chemical	CAS #	Program
Anthracene	120-12-7	Similar to anthracene oil, CAS # 90640805
Quinoline	91225	Not an HPV compound
Sodium hydroxide	1310732	Not an HPV compound; inorganic
Phenol	108952	OECD compound
Cresol	95487	OECD compound
Naphthalene	91-20-3	OECD compound; see above
Methylnaphthalenes	1321944	Similar to naphthalene, CAS # 91-20-3