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Solutia Inc
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February 17, 2003

Ms. Christine Whitman
Administrator
U.S. Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116

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Attention: Chemical Right-to-Know Program

In re: HPV Chemicals Challenge
Company Registration Number
CAS Numbers: 92-06-8; 92-94-4

Dear Administrator Whitman:

Solutia Inc has committed to providing HPV Chemicals Challenge dossiers for all of the chemicals we manufacture at rates above one million pounds per year for TSCA regulated purposes. As we began implementation of the final phase of dossier preparation to be concluded as 2003 submissions, we reviewed our previous commitments and determined that a clarification is necessary.

We have determined that it is not appropriate for us to provide a HPV Chemicals Challenge dossier for the following two chemicals:

CAS Registry Number 92-06-8
m-terphenyl

CAS Number 92-94-4
p-terphenyl

We are therefore withdrawing our commitment for these two chemicals. The basis for this decision is as follows:

Our original commitment to prepare HPV Chemical Challenge dossiers for these two chemicals was based on our erroneous reporting of these individual isomers of terphenyl on the 1994 TSCA Inventory Update Report. Solutia manufactures for commercial purposes a mixed isomer terphenyl product, CAS Registry Number 26140-60-3. The individual isomers of terphenyl, including the specific chemicals listed above, are not separated from this mixture for any commercial purpose. In the 1994 IUR, we inadvertently reported production of each isomer instead of the production of the mixture.

During 2003 we are committed to preparation and submission of a HPV Challenge dossier for this terphenyl mixture, CAS Number 26140-60-3. Consistent with the Agency guidelines as to what to test in the HPV Challenge, we will use data on these individual isomers of terphenyl, where appropriate, as surrogates or to improve the validity of the mixed isomer dossier.

We would request that the Agency correct its records accordingly relative to our withdrawal of intent to complete an HPV dossier on these isomers of terphenyl. Please feel free to contact me at 314-674-8815 or frjoa@solutia.com if there are any questions.

Sincerely,

Frederick R. Johannsen, Ph.D.
Solutia HPV Coordinator

cc:

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