

201-14718



Polymer Chemicals

September 2, 2003

Ms. Marianne Horinko, Acting Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, Virginia 22116

Attention: Chemical Right-to-Know Program

Dear Ms. Horinko:

The EPA proposed test rule for HPV chemicals published in the December 26th, 2000 Federal Register lists 1,2-benzenedicarboxylic acid, bis (2-methylpropyl) ester (CAS# 84-69-5), also known as diisobutyl phthalate or DIBP. Akzo Nobel Polymer Chemicals LLC, a processor of DIBP, is requesting that DIBP be removed from the HPV list and the upcoming final test rule based on past, current and estimated future annual production volumes of less than one million pounds per year.

This request is based on Akzo Nobel's communications with Unitex Corporation and BASF Corporation, two major producers of DIBP. The Unitex Inventory Update Rule (IUR) submissions from 1994, 1998 and 2002 show DIBP production volumes of 423,504 pounds in 1993, 1,132,645 pounds in 1997 and 761,350 in 2001. Although the 1997 volume is above the one million pound threshold for HPV chemicals, the 2001 value and estimated future annual production volumes are less than one million pounds. Please contact Dr. Jim Day, Assistant to the President, at Unitex for any additional information. He can be reached at 336-378-0965. BASF has informed Akzo Nobel that the BASF annual production volumes are approximately 35,000 pounds per year and should not significantly increase in the future.

In addition, please note that although the EPA website lists the 2001 and previous IUR production volumes for DIBP at 1-10 million pounds, it is probable that structurally similar chemicals such as dibutyl phthalate, diethyl phthalate and dimethyl phthalate have had their annual production volumes combined with that of DIBP. Please confirm this when considering this request.

The technical contact for this request is David Brandwene of Akzo Nobel Chemicals Inc. He can be reached at 914-674-5546 or by e-mail at david.brandwene@akzonobel.com.

Thank you for your attention.

Sincerely,

Steve White
Business Manager
Polymerization Catalysts

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