



201-14762 ✓

CYTEC INDUSTRIES INC.

Toxicology & Product Regulatory
Compliance Department
5 Garret Mountain Plaza
West Paterson, NJ 07424

Phone 973 357- 3372
Fax 973 357-3057
Email: Randy_Deskin@Cytec.com

October 1, 2003

U.S. Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
ATTN: Ms. Barbara Leczynski Chemical Right-To-Know Program
FAX 202 564-4775

RE: CAS # 27157-94-4 HPV Status

Dear Ms. Leczynski:

I am writing as a follow-up to our April 29, 2003 request that the EPA change the status of a Cytec sponsored chemical from HPV to No Longer HPV. This chemical was initially volunteered by Cytec Industries Inc. as part of our 1999 voluntary commitment and was sponsored for test plan/robust summary submission in 2003. Our previous attempts to have this chemical delisted from the HPV program have gone unanswered by the agency.

The chemical, phosphorodithioic acid O,O-ditolyl ester (CAS # 27157-94-4) was reported by Cytec on the 1990 IUR at greater than 1 million pounds production. In 1992, production of this chemical was moved from our Warners, NJ plant to our Atequiza, Mexico plant. As per our 1994, 1998 and 2002 IUR reporting, Cytec's import of this chemical into the US was 43,289 lbs, 176,718 lbs and 0 lbs, respectively. At this time, we believe that Cytec was the only manufacturer/importer of this material. We believe that this follows the guidance as published by EPA in support of HPV program delisting.

We do not anticipate that this chemical will be manufactured in the US nor imported into the US at significant quantities and as such will not likely become HPV again. We understand that the only other manufacturer which reported in 1990, Minerec is no longer in operation. In addition, due to a lack of additional large mining operations opening in the US, we believe that there is little opportunity for this material to be imported in large quantities into the US ever again.

We request that the EPA change the status of this chemical to NO Longer HPV. We understand that the chemical will not be removed from the HPV list and that its status will be changed upon EPA's concurrence with this request.

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DPPT/CBIC
03 OCT - 6 PM 3:23

October 1, 2003

Sincerely,

Randy Deskin, PhD, DABT
Director, Toxicology and Product Regulatory Compliance



201-14425

CYTEC INDUSTRIES INC.

Toxicology & Product Regulatory
Compliance Department
5 Garret Mountain Plaza
West Paterson, NJ 07424

Phone 973 357- 3372
Fax 973 35793057
Email: Randy_Deskin@Cytec.com

April 30, 2003

U.S. Environmental Protection Agency
PO Box 1473
Merrifield, VA 22116
ATTN: Rich Hefter Chemical Right-To-Know Program

RECEIVED
OPTIC
2003 MAY -2 AM 9:37

Dear Mr. Hefter:

I am writing to request that the EPA change the status of a Cytec sponsored chemical from HPV to No Longer HPV. This chemical was initially volunteered by Cytec Industries Inc. as part of our 1999 voluntary commitment and was sponsored for test plan/robust summary submission in 2003.

The chemical, phosphorodithioic acid O,O-ditolyl ester (CAS # 27157-94-4) was reported by Cytec on the 1990 IUR at greater than 1 million pounds production. In 1992, production of this chemical was moved from our Warners, NJ plant to our Atequiza, Mexico plant. As per our 1994, 1998 and 2002 IUR reporting, Cytec's import of this chemical into the US was 43,289 lbs, 176,718 lbs and 0 lbs, respectively. The fact that this chemical should be changed to No Longer HPV is further substantiated by the fact that manufacture at our Atequiza, Mexico plant in the years in between IUR reporting periods also was less than 500,000 lbs. At this time, we believe that Cytec was the only manufacturer/importer of this material. We believe that this follows the guidance as published by EPA in support of the HPV program.

We do not anticipate that this chemical will be manufactured in the US nor imported into the US at quantities of 1 million pounds or greater and as such will not likely become HPV again. We understand that the only other manufacturer/importer which reported in 1990, Minerec is no longer in operation. In addition, due to a lack of additional large mining operations opening in the US, we believe that there is little opportunity for this material to be imported in large quantities into the US ever again.

We request that the EPA change the status of this chemical to NO Longer HPV. We understand that the chemical will not be removed from the HPV list and that its status will be changed upon EPA's concurrence with this request.

Sincerely,

Randy Deskin, PhD, DABT
Director, Toxicology and Product Regulatory Compliance

201-14425



Peter Wendol kowski
04/30/2003 03:09 PM

To: Peter Wendolkowski/DC/USEPA/US@EPA
cc:
cc:
Subject: Here is a comitment letter for AR 201.



"Deskin, Randy"
<Randy.Deskin@cytec.com>
04/29/2003 09:38 AM

To: Richard Hefter/DC/USEPA/US@EPA
cc: Karen Boswell/DC/USEPA/US@EPA, "Vernon, Patricia"
<Patricia.Vernon@cytec.com>
Subject:

Attached, find our submission for CAS # 27157-94-4 for the HPV program.



Randy Deskin.aero25hvp.doc

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DPPT/NCIC
2003 MAY -2 AM 9:37