

201-15614



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AUG 2 - 2004

Ms. Linda C. Burgett  
The Dow Chemical Company  
1803 Building  
Midland, Michigan 48674

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dear Ms. Burgett:

Thank you for your letter dated October 29, 2003 to the U.S. Environmental Protection Agency (EPA) regarding the EPA's High Production Volume (HPV) Challenge Program. We apologize for the delay in responding.

Your letter requests that 1,3-Dichloro-2-Propanol (CAS No. 96-23-1) and 2,3-Dichloro-1-Propanol (CAS No. 616-23-9) be removed from EPA's HPV Challenge Program Chemical List.

As you know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) in March 1999. Among the prerequisites to be considered for removing a chemical from the HPV Challenge Program is that the chemical does not meet Inventory Update Rule (IUR) reporting requirements for the two most recent reporting years, in this case 1998 and 2002. Our review of pertinent IUR reporting data for these years indicates that 1,3-Dichloro-2-Propanol (CAS No. 96-23-1) was reported by Dow and Inspec Fine Chemicals Inc. in 1998. Therefore, EPA has determined as follows:

- 1,3-Dichloro-2-Propanol (CAS No. 96-23-1) **does not meet** the no longer HPV criteria
- 2,3-Dichloro-1-Propanol (CAS No. 616-23-9) **does meet** the no longer HPV criteria

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tsc-hotline@epa.gov](mailto:tsc-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201

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