



201-15468

Product Safety and Regulatory Affairs

July 1, 2004

Mike Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Re: HPV Chemical Challenge Program

RECEIVED
CPT/CRC
04 JUL 20 PM 2:09

Dear Mr. Leavitt:

Crompton Corporation acquired interest in CAS No. 26401-27-4 (Phosphorous acid, isoctyl diphenyl ester) on July 31, 2003 from GE Specialty Chemicals: We intend to begin manufacturing this chemical as sole producer at a volume less than 100,000 pounds. We therefore request that it be removed from the HPV chemical list as it will no longer meet the volume threshold.

Crompton's commitment for the remaining CAS Nos. listed in our 30 November 1999 and 22 December 1999 letters to you remains intact.

Should you have any questions please do not hesitate to contact me directly at (203) 573-2219. My fax number is (203) 573-4531.

Sincerely yours,

Alan Taylor, Ph.D.
Director, Product Safety and Regulatory Affairs
Crompton Corporation

cc: Barbara Leczynski, USEPA
Jim Keith, ACC Product Stewardship Team

