



SOCMA

SYNTHETIC ORGANIC CHEMICAL MANUFACTURERS ASSOCIATION

201-15478

July 26, 2004

RECEIVED
APR 29 11:40 AM '04

Ms. Diane Sheridan
7405M
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, DC 20460

RE: Metal Carboxylates group – Status of U.S. High Production Volume (HPV) Challenge Chemicals

Dear Ms. Sheridan:

The Metal Carboxylates Coalition (MCC), a group of interested parties organized under several subgroups and managed by the Synthetic Organic Chemical Manufacturers Association (SOCMA), is seeking the Agency's assistance in confirming the HPV status of several compounds originally listed on the 1990 Inventory Update Rule (IUR) list. The MCC is seeking to evaluate the HPV status of these chemicals in order to revitalize efforts to incorporate into our voluntary program all companies which manufacture or import these chemicals today.

On December 19, 2002, the MCC submitted a letter to the Agency regarding the following compounds:

2420-98-6	Hexanoic acid, 2-ethyl, cadmium
52270-44-7	Neodecanoic acid, cobalt (2+) salt

The Agency confirmed that the above compounds are no longer HPV on June 21, 2001 through electronic and telephone correspondence with SOCMA staff. Furthermore, the 2002 IUR report reflects this determination and establishes that these chemicals remain below the threshold for HPV. MCC previously requested that these chemicals receive an indicator "5" designation for no longer HPV. We are now renewing this request along with a request for confirmation from the Agency and will await a response.

Based on newly available information, the following chemicals are potentially below the HPV threshold:

61789-52-4	Fatty acids, tall oil, cobalt salts
13586-84-0	Cobalt stearate
1560-69-6	Propionic acid, cobalt (2+) salt
68955-83- 8 9	Fatty acids, C9-C13- neo cobalt salts
12001-85-3	Naphthenic acids, zinc salt
6865-35-6	Barium stearate





The MCC is asking the Agency to examine the HPV status of these chemicals and to notify the coalition whether production and import levels are above or below 1 million pounds annually. Information available to the public via the 2002 IUR indicates these chemical may no longer be HPV.

The interested parties organized under SOCMA's Metal Carboxylates Coalition remain committed to the High Production Volume Chemical Challenge. Thank you for your help and we look forward to receiving your response.

Sincerely,

/s/

Lynne Jones
Executive Director
SOCMA's Metal Carboxylates Coalition



201-15478



Lynne Jones
<Jonesl@socma.com>
07/28/04 10:48 AM

To: Diane Sheridan/DC/USEPA/US@EPA
cc:
Subject: RE: Metal Carboxylates Inquiry - HPV Status of Several Chemicals

Sorry, it should be 68955-83-9. My apologies for the error.

Lynne

-----Original Message-----

From: sheridan.diane@epamail.epa.gov
[mailto:sheridan.diane@epamail.epa.gov]
Sent: Wednesday, July 28, 2004 10:51 AM
To: Lynne Jones
Cc: Washington.Annette@epamail.epa.gov
Subject: Metal Carboxylates Inquiry - HPV Status of Several Chemicals

Hi Lynne,

The lead staff person working on this, Annette Washington has informed me that CAS # 68955836 is not on the HPV Challenge List. Do we have it correct?

Diane

COURIER/DELIVERY ADDRESS:
1201 Constitution Avenue, N.W.
Room 4351A
Washington, DC 20460
202/564-8178 (Phone)
202/564-4775 (Fax)

----- Forwarded by Diane Sheridan/DC/USEPA/US on 07/28/04 08:59 AM -----

RECEIVED
07/29/04
04 JUL 29 AM 10:40

Lynne Jones <Jonesl@socma.com>



Lynne Jones
<Jonesl@socma.com>
07/26/04 04:36 PM

To: Diane Sheridan/DC/USEPA/US@EPA
cc:
Subject: Metal Carboxylates Inquiry - HPV Status of Several Chemicals

Good Afternoon Diane:

In response to our telephone conversation of July 19, please find attached to this message a letter requesting updated information on several HPV chemicals.

Please contact me if you require additional information.

Sincerely,
Lynne Jones

Lynne Jones
Assistant Manager
SOCMA Visions
Tel: (202) 721-4157
jonesl@socma.com
www.socma.org



epainquiry 072604.pdf



SOCMA

SYNTHETIC ORGANIC CHEMICAL MANUFACTURERS ASSOCIATION

201-14151

December 19, 2002

RETURN RECEIPT BY E-MAIL, PLEASE

Christine Todd Whitman, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

RE: Metal Carboxylates Coalition amendment of U.S. High Production Volume Challenge sponsorship commitment

Dear Administrator Whitman:

The Metal Carboxylates Coalition (MCC) wishes to amend its original U. S. High Production Volume (HPV) Challenge sponsorship submitted in a letter dated November 30, 1999.

The following compounds are no longer high production volume (HPV) chemicals:

2420-98-6 Hexanoic acid, 2-ethyl, cadmium salt
52270-44-7 Neodecanoic acid, cobalt (2+) salt

The non-HPV status of these chemicals was confirmed through correspondence via e-mail with the Environmental Protection Agency on June 27, 2001. These chemicals were HPV in 1990 but not in 1994 or 1998. Furthermore, there is no expectation for these compounds to be HPV in the future.

The following compound is also no longer sponsored by MCC:

68515-89-9 Barium, carbonate nonylphenol complexes

It is not possible to isolate this compound as a discrete entity. It does not exist outside of highly formulated systems.

The MCC requests the Agency remove these three chemicals from the current HPV list.

MCC's commitment of the remaining 20 compounds under the U.S. HPV Challenge Program remains intact. Any further questions regarding this issue should be directed to me at 202-721-4157 or jonesl@socma.com.

Sincerely,

Lynne Jones
Executive Director

