

WACKER

201-15548

SHARRONN E. ETTER
DIRECTOR, REGULATORY
AFFAIRS AND PRODUCT
SAFETY
DEPARTMENT

Wacker Chemical Corporation
3301 Sutton Road
Adrian, MI 49221-9397, USA
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July, 12, 2004

Ms. Barbara A. Leczynski
Existing Chemicals Branch
Chemical Control Division
Ronald Reagan Complex
East Building; 1201 Constitution Ave.
Washington, D.C. 20460

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RECEIVED

Request to Remove a Chemical from the HPV Challenge Program

Dear Ms. Leczynski;

Wacker Chemical Corporation again requests that EPA consider removing Silane, dichloro(chloromethyl)methyl; CAS No. 1558-33-4 from the HPV Challenge program.

We have confirmed that all manufacturers that reported to the 1990, 1994 and 1998 IUR are no longer producing this chemical. There was only one manufacturer, DuPont and per the attached letter, they have stated that they no longer make or import this chemical nor do they intend to make or import it in the future.

Wacker purchased the Silane, dichloro(chloromethyl)methyl; CAS No. 1558-33-4 business from DuPont in 1999. In 2000, We commenced importing this material to one custom customer. Since 2000 we have not exceeded 250 tons per year. Future imports are expected to remain less than 200 tons per year.

Therefore, Wacker believes that Silane, dichloro(chloromethyl)methyl; CAS No. 1558-33-4 is no longer HPV because:

1. All manufacturers who reported for the 1990, 1994 and 1998 IUR have provided support that they no longer manufacture or import the chemical and that they are not likely to do so in the future. Please see the attached letter from DuPont.
2. Since 1999 when Wacker purchased this business from DuPont, Wacker has not exceeded or approached the 1 million pound limit and
3. Wacker does not anticipate exceeding 500,000 pounds per year in the future.

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We respectfully request that EPA consider removing Silane, dichloro(chloromethyl)methyl; CAS No. 1558-33-4 from the HPV Challenge program.

If you have any questions or require further information, please contact me at the numbers or address above.

Sincerely,

Sharronn E. Etter
Director, Regulatory Affairs and Product Safety



*Safety, Health & Environment Excellence Center
1007 Market Street, DuPont 6082
Wilmington, DE 19898
302-773-0910 (Office) – 302-774-3140 (Fax)*

April 23, 2004

Sharronn E. Etter
Wacker Chemical Corporation
3301 Sutton Road
Adrian, MI 49221-9397

Dear Ms. Etter,

E. I. du Pont de Nemours and Company ceased manufacture of Silane, dichloro(chloromethyl)methyl; CAS# 1558-33-4 in 1998 and does not have plans for future manufacture or import of the material. DuPont informed the EPA of this in a letter dated January 19, 2000, to Administrator Carol Browner

Please feel free to contact me with any questions or concerns you may have with regards to this matter at Edwin.L.Mongan-1@usa.dupont.com or by phone at 302-773-0910.

Sincerely,

Edwin L. Mongan, III
Manager, Environmental Stewardship
DuPont Safety, Health & Environment