

201-15595



May 12, 2000

RETURN RECEIPT REQUESTED

Mr. Charles Auer  
Director, Chemical Control Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Dear Mr. Auer:

On November 23, 1999, we submitted a request for delisting of Cyclohexanone Oxime (CAS 100-64-1) from the HPV list on the basis of being a non-isolated intermediate in the production of caprolactam. A copy of our original letter is attached.

As we have not, to date, received a response of any type to this request, the responsible committee has asked that I follow-up to be sure the initial request had not gone astray. If the request is still under review within EPA, we would appreciate a response to that effect.

We would appreciate your assistance in this matter.

Sincerely,

William E. Rinehart, Sc.D.  
President Emeritus and  
Consultant in Toxicology

WER:la

cc: Nylon 6 Committee  
S.J. Wilkie



November 23, 1999

Mr. Charles Auer  
Director, Chemical Control Division  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

RE: Delisting of Cyclohexanone  
Oxime (CAS 100-64-1) from  
the HPV Chemicals list

Dear Mr. Auer:

The Industrial Health Foundation, Inc. (IHF), acting as agent for the Health and Environmental Effects of Nylon 6 and Its Precursors Committee, requests removal of cyclohexanone oxime (CAS 100-64-1) from the High Product Volume (HPV) list of chemicals.

The IHF Committee on Health and Environmental Effects of Nylon 6 and Its Precursors is comprised of the following companies: AlliedSignal, Inc., BASF Corporation, and DSM Chemicals North America, Inc. To the best of our knowledge, these companies represent 100% of the U.S. production of caprolactam and Nylon 6.

Cyclohexanone oxime (CAS 100-64-1) is produced by these companies as a non-isolated intermediate which is rearranged to produce caprolactam. It is not separated after formation from cyclohexanone and hydroxylamine and is no longer sold as a separate product. The manufacturers of caprolactam have advised that the oxime is generally converted to caprolactam within hours of its formation. Therefore it does not seem to be an appropriate candidate for inclusion on the HPV list.

Please contact me by phone at 412/363-6600 or by FAX at 412/363-6605 or via E-mail at [ihfincorp@aol.com](mailto:ihfincorp@aol.com) to confirm this delisting or if you desire further information on this matter.

Sincerely,

William E. Rinehart, Sc.D.  
President Emeritus and  
Consultant in Toxicology

WER:la  
cc: Nylon 6 Committee  
Mrs. S. J. Wilkie

A NONPROFIT ORGANIZATION FOR THE ADVANCEMENT OF HEALTHFUL WORKING CONDITIONS

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