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CARGILL

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November 24, 1999

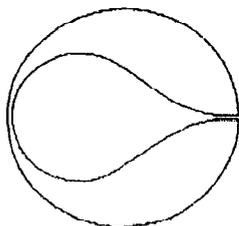
Joseph S. Carra
Deputy Director, Office of Pollution Prevention and Toxics (7401)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Re: Request to Remove "Fats and Glyceridic Oils, Vegetable Oil Distillates (CAS No. 68476-80-2) from the HPV List

Dear Mr. Carra:

I am writing in support of the letter dated November 30, 1999, that is being submitted to you by the National Oilseed Processors Association ("NOPA"), the Institute of Shortening and Edible Oils ("ISEO"), the National Cotton Council of America ("NCCA"), the National Cottonseed Products Association ("NCPA"), and the Corn Refiners Association ("CRA") (together, the "Associations"). In that letter, the Associations request that EPA remove "Fats and Glyceridic Oils, Vegetable, Deodorizer Distillates" (CAS No. 68476-80-2) (hereinafter referred to as "Vegetable Oil Distillates") from the list of chemicals subject to testing under the HPV program.

Cargill, Inc. reported Vegetable Oil Distillates production for the 1990, 1994 and 1998 IUR reporting cycles. This letter will confirm that Cargill, Inc. produces Vegetable Oil Distillates without separate intent as a byproduct of the vegetable oil refining process and that we produce the substance solely for use as a source material from which other substances, primarily Vitamin E, are extracted. Further, we anticipate that any future production of Vegetable Oil Distillates will also be produced in the manner and for the uses just described. Consequently, none of the Vegetable Oil Distillates manufactured by Cargill, Inc. should be counted toward the 1 million-pound threshold for designation as an HPV chemical.



If you have any questions regarding this letter submission or if you desire additional information pertaining to Cargill, Inc's. production of Vegetable Oil Distillates, please contact me at (612)742-6671

Sincerely,

Leroy Venne
Safety Coordinator

LV:lh

cc: Charles M. Auer
David C. Ailor