

201-15622



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 15 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Leroy Venne  
Safety Coordinator  
Cargill, Incorporated  
15407 McGinty Road West  
Wayzata, MN 55391-2399

04 OCT - 1 PM 1:53

RECEIVED

Dear Mr. Venne:

Thank you for your letter dated November 24, 1999, to the U.S. Environmental Protection Agency (EPA), regarding the High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

Your letter was written in support of a November 30, 1999 letter from the National Oilseed Processors Association which requested that Fats and Glyceridic Oils, Vegetable, Deodorizer Distillates (CAS No. 68476-80-2) be removed from the HPV Program because it is not an HPV chemical.

Your letter states that Cargill, Inc. reported Vegetable Oil Distillates production for the 1990, 1994 and 1998 IUR reporting cycles and confirms that you produce vegetable oil distillations without separate intent as a byproduct of the vegetable oil refining process and you produce the substance solely for use as a source material from which other substances, primarily Vitamin E, are extracted and that you don't foresee any changes to that process in the future.

Your letter requests EPA remove Fats and Glyceridic Oils, Vegetable, Deodorizer Distillates (CAS No. 68476-80-2) from the HPV Challenge Program Chemical List because it is a byproduct in the vegetable oil refining process and is not produced for commercial intent. If Fats and Glyceridic Oils, Vegetable, Deodorizer Distillates (CAS No. 68476-80-2) has been erroneously reported to the IUR, EPA encourages Cargill to amend its reporting to the IUR.

As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its ChemRTK website at [www.epa.gov/chemrtk](http://www.epa.gov/chemrtk) in March, 1999. Based on EPA's review of all the pertinent IUR data from 1998 and 2002, EPA has determined that Fats and Glyceridic Oils, Vegetable, Deodorizer Distillates (CAS No. 68476-80-2) **does not meet** the "no longer HPV" criteria.

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tsca-hotline@epa.gov](mailto:tsca-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: Archer Daniels Midland Company  
Henkel Corporation  
AR201