



December 16, 2004

USPS Certified Mail, Return Receipt Requested

Mr. Mike Leavitt, Administrator
 US Environmental Protection Agency
 P.O. Box 1473
 Merrifield, VA 22116
 Attention: Chemical Right-to-Know Program

Dear Administrator Leavitt:

Re: HPV Commitment

Ferro Corporation ("Ferro") actively supports the High Production Volume (HPV) Chemical Right-to-Know Program with our participation in several consortia and by individually sponsoring chemicals. In response to USEPA's letter of April 12, 2004 (Charles M. Auer to Dr. Barry Misquitta,) Ferro modifies its commitment as follows:

| <u>CAS Number</u> | <u>9th Collective Index Name</u> | <u>Ferro Action(s)</u> |
|--------------------------|---|--|
| 2420-98-6 | Hexanoic acid, 2-ethyl-, cadmium salt | Withdraw sponsorship because volume is below HPV threshold, and Ferro's production of the material has been steadily decreasing. We believe this chemical is no longer HPV. |
| 6865-35-6 | Barium Stearate | Withdraw sponsorship because volume is below HPV threshold as best as we can determine through the SOCMA MCC consortium for the chemical. Ferro's production of this material has been steadily decreasing. We believe this chemical is no longer HPV. |
| 16883-83-3 | 1,2 Benzenedicarboxylic acid, 2,2-dimethyl-1-(1-methylethyl)-3-(2-methyl-1-oxopropoxy)propyl phenylmethyl ester | This chemical is included in a revised HPV Test Plan to be submitted by the American Chemistry Council's Phthalate Esters Panel. |
| 68515-89-9 | Barium, carbonate nonylphenol complexes | Withdraw sponsorship because these chemicals are non-isolated intermediates. We believe these chemicals should NOT be HPV. |

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| <u>CAS Number</u> | <u>9th Collective Index Name</u> | <u>Ferro Action(s)</u> |
|-----------------------|--|---|
| 301-10-0 | Hexanoic Acid, 2-Ethyl, Tin (2+) Salt | Withdraw Ferro sponsorship of this chemical because it is fully sponsored by the ORTEC consortium. |

We look forward to fulfilling our commitments on our sponsored chemicals.

Sincerely,

Alan J. Olson, P.E.
Director of Technology
Ferro Performance Chemicals Group
216-750-6696
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cc: Karen Hoffman-USEPA, HPV Program
Marian Stanley-ACC Phthalate Esters Panel
Lynne Jones-SOCMA Metal Carboxylates Coalition