

201-16177

Jeffrey Taylor/DC/USEPA/US

To NCIC HPV@EPA

01/13/2006 04:06 PM

cc

bcc

Subject AR201 -- Technical Letter -- Fw: Bayer CropScience HPV Letters

{Note that the 4 chemicals referenced in the two files below are NOT considered Confidential Business Information (CBI). Bayer CropScience does not wish to have anything CBI with these 4 chemicals. The reason why the actual amendments -- which were submitted separately to EPA -- are considered CBI is because there are other chemicals referenced on those amendments that are CBI. The communication below is fully intended for public access.}

-- Jeffrey Taylor, EPA Environmental Protection Specialist

01/13/2006 02:43 PM

From: Greg Moerer <greg.moerer@bayercropscience.com>
To: Jeffrey Taylor/DC/USEPA/US@EPA

cc:
Mark Tice <mark.tice@bayercropscience.com>,
Eric Rivadeneira <eric.rivadeneira@bayercropscience.com>,
Greg Moerer <greg.moerer@bayercropscience.com>

Subject: Bayer CropScience HPV Letters

Jeffrey:

Per our phone conversation I am sending you the cover letters for our 1998 and 2002 IUR re-submittals without the CONFIDENTIAL attachments. This will allow the "no longer HPV" work to continue parallel to the confidential document procedures.

Thanks

Greg Moerer
Bayer CropScience



KCHPV IUR 1998 Update Letter to EPA.doc KCHPV IUR Update Letter to EPA.doc

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Bayer CropScience



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Amended IUR Report 2002 - HPV Program

US Environmental Protection Agency
EPA Building East
Confidential Business Information Center
1201 Constitution Avenue, NW
Washington, DC 20004

November 22, 2005

Bayer CropScience
8400 Hawthorne Road
Kansas City, MO 64120
Phone: 816-242-2250

Dear Sir:

Attached is an amended 2002 IUR Form U for the Bayer CropScience site in Kansas City, Missouri. Please note that since 2002, the Kansas City site has changed its name to Bayer CropScience LP, but it is the same site listed on the IUR.

Also attached is a letter from Diane Sheridan, Chemical Control Division USEPA (dated December 03, 2004) describing four chemicals that have been removed from the HPV Challenge program because they have been categorized as non-isolatable and non-reportable under the IUR rules.

These four chemicals previously had been voluntarily adopted for HPV review by Bayer Crop Sciences, the direct predecessor of Bayer CropScience LP. Bayer has subsequently determined and the USEPA had agreed, that these four chemicals were exempt from HPV testing but the USEPA recommended that Bayer amend its 2002 IUR to remove these chemicals so that the USEPA could then reclassify these four chemicals as "no longer HPV".

Accordingly, we are amending the 2002 IUR for Bayer CropScience LP(and also as successor to Bayer Corporation and Bayer Crop Sciences) to remove the following four chemicals:

Page 2 of 2

CAS Number	Chemical Name
693-07-2	Ethane, 1-chloro-2-(ethylthio)-
20469-71-0	Hydrazinecarbodithioic acid, compd. with hydrazine (1:1)
22591-21-5	2-Butanone, 1,1-dichloro-3,3-dimethyl-
33509-43-2	1,2,4-Triazin-5(2H)-one,4-amino-6-(1,2-dimethylethyl)-3,4-dihydro-3-thoxo-

Attachments:

Attachment One - Original Form U 2002 IUR Submittal
Attachment Two - Updated Form U 2002 IUR Submittal
Attachment Three - Letter from Diane M Sheridan USEPA to Janet Mostowy

Please contact the undersigned if you have any questions or need further information.

Sincerely,

Greg Moerer
Manager – Environmental and Security

Cc: USEPA-Diane M. Sheridan
G Goodridge
J Mustowy
Bcc: M. Boucher

Bayer CropScience



201-16177

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Amended IUR Report 1998 - HPV Program

December 15, 2005

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1201 Constitution Avenue, NW
Washington, DC 20004

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Greg Moerer
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CC: USEPA-Diane M. Sheridan
G Goodridge
J Mustowy