



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB 22 2006

Mr. Walter L. Jones  
President and COO  
Pine Chemicals Association, Inc.  
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Suite 1900  
Atlanta, GA 30339

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dear Mr. Jones:

Thank you for your letter of April 28, 2003, to the Administrator, U. S. Environmental Protection Agency (EPA), regarding EPA's High Production Volume (HPV) Challenge Program. I apologize for the delay in responding to your inquiry.

In your letter, you notified EPA that it needed to update its records regarding the sponsorship status of two chemicals on the HPV Challenge Chemical List:

- Tall-Oil Rosin (CASRN 8052-10-6)
- Fatty Acids, C18-unsaturated, dimers, distillation lights (CASRN 68956-12-7)

You state that the HPV Challenge web site lists these two chemicals as "orphaned chemicals." However, you indicate that the Pine Chemicals Association, Inc. (PCA) HPV Task Force has made commitments that account for both of these substances. Therefore, PCA asks that the Agency appropriately annotate these substances on the HPV Challenge Chemical List to indicate they are indeed sponsored chemicals. Based on both the information you provided to support your request and any other activities related to Tall-Oil Rosin (CASRN 8052-10-6) and Fatty Acids, C18-unsaturated, dimers, distillation lights (CASRN 68956-12-7), EPA has assessed the status of the two chemicals in order to appropriately update our program information.

Regarding Tall-Oil Rosin (CASRN 8052-10-6), EPA has noted PCA's comments regarding its sponsorship of this chemical under the HPV Challenge Program. However, two events have occurred since your correspondence that have resulted in this substance no longer being an orphan chemical and in EPA no longer pursuing further information on this chemical under the HPV Challenge Program. First, CASRN 8052-10-6 is currently sponsored under the International Council of Chemical Associations (ICCA) HPV Initiative by the Hydrocarbon and Rosin Resins Producers Association (HARRPA) ICCA Consortium. Therefore, it is no longer considered an orphan since ICCA sponsorship is equivalent to sponsorship under the EPA HPV Challenge Program. Second, as you noted in your letter, Tall-Oil Rosin (CASRN 8052-10-6) has been merged with Rosin (CASRN 8050-09-7) for purposes of the Toxic Substance Control Act (TSCA). EPA determined that these two chemical nomenclatures have been used interchangeably, and for purposes of the TSCA Inventory, the Agency has consolidated these two separate CASRNs into one chemical substance known as Rosin (CASRN 8050-09-7).

As a result, although Tall-Oil Rosin (CASRN 8052-10-6) will remain on the HPV Challenge Chemical List, it will be assigned an Indicator of "1." Assigning an indicator of "1" implies that the chemical is not considered a candidate for testing under the HPV Challenge Program because an EPA review indicated that testing would not further our understanding of the chemical's properties. This chemical may be sponsored, however. These two events collectively should remove any concerns noted by PCA for Tall-Oil Rosin (CASRN 8052-10-6) under the HPV Challenge Program.

For Fatty Acids, C18-unsaturated, dimers, distillation light (CASRN 68956-12-7), PCA's comments regarding its sponsorship of this chemical under the HPV Challenge Program have also been noted by the Agency. However, information on this chemical is no longer being pursued under the Program. EPA posted draft guidance on procedures for removing "no longer HPV" chemicals from the scope of the HPV Challenge Program on its Chemical Right-to-Know (ChemRTK) website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) in March 1999. According to this guidance, a chemical that has not been reported in HPV volume in the last two Inventory Update Rule (IUR) reporting years (i.e., 1998 and 2002) and is not likely to become HPV again is no longer considered an HPV chemical for purpose of the Program. Such chemicals are annotated as "no longer HPV" on the HPV Challenge Chemical List (i.e., assigned an Indicator of "5"). Based on our review, EPA has determined that Fatty Acids, C18-unsaturated, dimers, distillation light (CASRN 68956-12-7) **does meet** the "no longer HPV" criteria because it has not been reported to the Inventory since the 1990 IUR reporting period. Therefore, EPA is presently not pursuing further information on this chemical since it is no longer considered subject to the HPV Challenge Program. The current status of this substance should alleviate any concerns noted by PCA for Fatty Acids, C18-unsaturated, dimers, distillation light (CASRN 68956-12-7) under the HPV Challenge Program. An additional note regarding this chemical is that in contrast to the merging of CASRN 8052-10-6 with CASRN 8050-09-7 discussed above, EPA has not merged CASRN 68956-12-7 with CASRN 68955-98-6 for purposes of the TSCA Inventory as discussed by your organization. Although these two substances might be chemically equivalent, EPA considers them separate chemicals and lists them separately in the TSCA Inventory.

We will post PCA's 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) 564-8176. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) 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 [tsc hotline@epa.gov](mailto:tsc hotline@epa.gov).

Sincerely,



Jim Willis, Director  
Chemical Control Division

cc: AR-201