



CHEMICAL MANUFACTURERS ASSOCIATION

COURTNEY M. PRICE  
VICE PRESIDENT  
CHEMSTAR

December 1, 1999

Carol Browner  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22 116

Attn: HPV Challenge Program, Hydrocarbon Solvents HPV Consortium Second  
Commitment Addendum

Dear Ms. Browner:

The Chemical Manufacturers Association Hydrocarbon Solvents HPV Consortium ("Consortium") is amending its original commitment to the HPV Challenge Program in the following ways: 1) the Consortium has amended its list of volunteered CAS numbers to include several additional CAS numbers; and, 2) the Consortium is altering its sponsorship of p-xylene and mixed xylene and requesting that these chemicals be designated as status "2" on the HPV Challenge list based on new information regarding the sponsorship of these chemicals under the OECD SIDS Program. Attachment 1 shows all of the HPV CAS numbers that the Consortium is handling; the CAS numbers highlighted in bold are the new additions to the Consortium list.

The Consortium is also trying to form an international consortium with the CEFIC Hydrocarbon Solvents Producers Association and may be sponsoring some of these CAS numbers through the ICCA HPV Initiative. The Consortium will submit a separate letter indicating those CAS numbers that are ultimately sponsored through the ICCA program.

I. Additional CAS numbers being committed

The Hydrocarbon Solvents HPV Consortium is adding the following CAS numbers to its list of volunteered substances.

CAS No.	Chemical Name
111-84-2	Nonane
112-40-3	Dodecane
538-93-2	Isobutylbenzene
544-76-3	Hexadecane
629-50-5	Tridecane
629-62-9	Pentadecane
1321-94-4	Methylnaphthalene

25550-1 4-5	Ethyltoluene
<del>64741-85-1</del>	<del>Raffinates (petroleum), sorption process</del>
90622-46-1	Alkanes, C14-16
93924-07-3	Alkanes, C10-14
129813-67-8	Alkanes, C12-14

II. Several Xylene CAS numbers have been sponsored under OECD SIDS

The Consortium has recently learned that both p-xylene (CAS #106-42-3) and xylene (mixed isomers) (CAS # 1330-20-7) have already been sponsored under the OECD SIDS program. P-xylene has been reviewed by the OECD and a SIAR developed with the recommendation that no further testing is required. Xylene (mixed isomers) was recently sponsored by Hungary and a dossier is being developed. Because sponsorship in OECD should exempt these CAS numbers from the HPV Challenge Program, the Consortium now respectfully withdraws its commitment to handle these CAS numbers under the HPV Challenge Program and asks that EPA designate these CAS numbers as status "2". (Status "2" indicates a chemical being handled under the OECD SIDS Program.)

In addition to mixed xylene and p-xylene, the Consortium also volunteered for o-xylene (CAS # 95-47-6) and m-xylene (CAS # 108-38-3) in its March 15, 1999, letter. The Consortium will continue its sponsorship of o-xylene and m-xylene under the HPV Challenge program.

All other aspects of the Hydrocarbon Solvents HPV Consortium commitment to the HPV Challenge Program are unchanged. Copies of the letters previously submitted by the Consortium are attached.

If you have any questions, please contact Andrew Jaques, the Hydrocarbon Solvents HPV Consortium Manager at 703-741-5627 or [andrew\\_jaques@cmahq.com](mailto:andrew_jaques@cmahq.com).

Sincerely yours,

Courtney M. Price  
Vice President, CHEMSTAR

cc: Charles Auer, EPA  
Barbara Leczynski, EPA

Attachment I  
CMA Hydrocarbon Solvent HPV Consortium List

Cas #	Name	Start Year
78-78-4	Butane, 2-methyl-	2001
95-47-6	Benzene, 1,2-dimethyl-	2001
95-63-6	Benzene, 1,2,4-trimethyl-	2001
106-42-7	Xylene	Exempt
108-38-3	m-Xylene	2001
108-67-8	Mesitylene	2001
110-54-3	Hexane	2001
111-65-9	Octane	2001
111-84-2	Nonane	2001
112-40-3	Dodecane	2001
142-82-5	Heptane	2001
287-92-3	Cyclopentane	2001
538-93-2	Isobutylbenzene	2001
540-84-1	Pentane, 2,2,4-trimethyl-	2001
544-76-3	Hexadecane	2001
629-62-9	Pentadecane	2001
629-50-5	Tridecane	2001
1321-94-4	Methylnaphthalene	2001
7839-20-7	Xylene	Exempt
8032-32-4	Ligroine	2001
8052-41-3	Stoddard solvent	2001
25550-14-5	Ethyl toluene	2001
64741-63-5	Naphtha, (petroleum), light catalytic reformed	2001
64741-65-7	Naphtha, (petroleum), heavy alkylate	2001
64741-84-0	Naphtha, (petroleum), solvent-refined light	2001
64741-85-1	Raffinates, (petroleum), sorption process	2001
64742-46-7	Distillates, (petroleum), hydrotreated middle	2001
64742-47-8	Distillates, (petroleum), hydrotreated light	2001
64742-48-9	Naphtha, (petroleum), hydrotreated heavy	2001
64742-88-7	Solvent naphtha, (petroleum), medium aliph.	2001
64742-89-8	Solvent naphtha, (petroleum), light aliph.	2001
64742-94-5	Solvent naphtha, (petroleum), heavy arom.	2001
64742-95-6	Solvent naphtha, (petroleum), light arom.	2001
64771-72-8	Paraffins, (petroleum), normal C5-20	2001
68410-97-9	Distillates, (petroleum), light distillate hydrotreating process, low-boiling	2001
68476-50-6	Hydrocarbons, C <sub>5</sub> -rich, C <sub>5</sub> -6-rich	2001
68477-31-6	Distillates, (petroleum), catalytic reformer fractionator residue, low-boiling	2001
68551-16-6	Alkanes, C9-11-iso-	2001
68551-17-7	Alkanes, C10-13-iso-	2001
68551-19-9	Alkanes, C12-14-iso-	2001
68551-20-2	Alkanes, C13-16-iso-	2001
70024-92-9	Alkanes, C7-8-iso-	2001
70693-06-0	Aromatic hydrocarbons, C9-11	2001
90622-46-1	Alkanes, C14-16	2001
93924-07-3	Alkanes, C10-14	2001
129813-67-8	Alkanes, C12-14	2001



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COURTNEY M. PRICE  
VICE PRESIDENT  
CHEMSTAR

March 15, 1999

Carol Browner, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

Dear Ms. Browner:

The Chemical Manufacturers Association Hydrocarbon Solvents Panel will serve as an industry consortium to coordinate activities for the chemicals listed in Attachment I under the HPV Challenge Program. Attachment I also indicates the intended start date for each CAS number.

Many of the chemicals listed in Attachment I are also on the International Council of Chemical Association (ICCA) list of chemicals and may be sponsored by consortia outside the United States. Panel Members may seek international cooperation under the ICCA program with foreign producers of these chemicals. Accordingly, data presentation and any needed testing for these two chemicals may occur through the ICCA programs. If this becomes the case, the Panel will notify the U.S. Environmental Protection Agency and modify the Panel's commitment accordingly.

The following companies are currently participating in the Hydrocarbon Solvents Panel HPV Challenge consortium:

BP Amoco PLC  
Condea Vista Company  
Exxon Chemical Company  
Koch Chemical Company  
Marathon Ashland Petroleum L.L.C.  
Mobil Oil Corporation  
PDV Midwest Refining L.L.C.  
Phillips Petroleum Company  
Shell, Chemical Company  
Sunoco, Inc.

Each Panel member will be submitting a separate letter confirming their participation in the consortium. If, for any reason, this voluntary initiative will not be undertaken by the Hydrocarbon Solvents Panel, then any express or implied commitments to the HPV

March 15, 1999

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Challenge Program will devolve to the manufacturers and importers of the relevant chemicals.

The Hydrocarbon Solvents Panel and its member companies understand that sponsorship entails: (1) assembling and reviewing available test data, (2) developing and providing test plans for each of the sponsored chemicals, and where needed, (3) conducting additional testing in the time frame established by the Challenge Program. . The test data and any other study information that the Panel will provide under the Program will be made publicly available in the form of "robust summaries" as contemplated in the *Framework for Voluntary Testing of High Production Volume (HPV) Chemicals (10/8/98)*.

Barbara Francis, **the** Hydrocarbon Solvents Panel Manager, will serve as technical contact for the Panel. Ms. Francis can be reached at 703-741-5609 or [barbara\\_francis@cmahq.com](mailto:barbara_francis@cmahq.com).

Sincerely yours,

Courtney Price  
Vice President, CHEMSTAR



CHEMICAL MANUFACTURERS ASSOCIATION

COURTNEY M. PRICE  
VICE PRESIDENT  
CHEMSTAR

April 22, 1999

Carol Browner  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460

Attn: Chemical Right-to-Know Program; Hydrocarbon Solvents HPV Consortium  
Commitment Addendum

Dear Ms. Browner:

The Chemical Manufacturers Association Hydrocarbon Solvents HPV Consortium volunteered on March 15, 1999, to sponsor 34 CAS numbers under the HPV Challenge Program (see Attachment 2, letter from C. Price to C. Browner). The Consortium submits this addendum to identify two additional companies who have joined the Consortium and to provide the chemical names for the CAS numbers volunteered in the HPV Program. Attachment 1 provides the chemical name/CAS number description for the 34 CAS numbers for which we originally volunteered. Please update the internet listing for the Consortium by including the appropriate name with the CAS number.

Two additional companies have joined the Consortium -- Chevron Chemical Company and Fina Oil and Chemical Company. The following is a revised list of the companies currently participating in the Hydrocarbon Solvents HPV Consortium:

BP Amoco PLC  
Chevron Chemical Company  
Condea Vista Company  
Exxon Chemical Company  
Fina Oil and Chemical Company  
Koch Chemical Company  
Marathon Ashland Petroleum L.L.C.  
Mobil Oil Corporation  
PDV Midwest Refining L.L.C.  
Phillips Petroleum Company  
Shell Chemical Company  
Sunoco, Inc.

Hydrocarbon Solvents HPV Consortium Commitment Addendum

April 22, 1999

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Other than the addition of the two members to the Consortium (as noted above) and the chemical names/descriptions for the CAS numbers volunteered, the commitment of the Hydrocarbon Solvents HPV Consortium to the HPV Challenge Program (as specified in Attachment 2) is unchanged.

If you have any questions, please contact Barbara Francis, the Hydrocarbon Solvents HPV Consortium Manager at 741-5609 or [barbara\\_francis@cmahq.com](mailto:barbara_francis@cmahq.com).

Sincerely yours,

Courtney Price  
Vice President, CHEMSTAR

cc: Ken Moss, EPA