



CHEMICAL MANUFACTURERS ASSOCIATION

File-27.1

Robert A. Roland
President

October 3, 1990

John D. Burns
President and CEO
Vista Chemical Company
900 Threadneedle
Houston, TX 77079

Dear John:

We are asking for your participation in the Organization for Economic Cooperation and Development (OECD) High Production Volume (HPV) Existing Chemicals Testing Program. We are requesting that you indicate ~~your~~ commitment to take lead responsibility for a chemical in the OECD Chemicals Program by completing the enclosed reply form.

The OECD Chemicals Program offers the most viable forum for harmonizing international testing requirements and acceptance of test data. The OECD program will also promote sharing the burden of chemical testing with producers in other countries. Additionally, the OECD program could influence the EPA's efforts to "revitalize" the TSCA testing program and the European Economic Community's proposed regulations.

The OECD HPV Chemicals Program was endorsed by CMA's Board of Directors in September 1989, and several U.S. producers agreed to participate in Phase I of the Pilot Program. The Pilot Program is a voluntary effort to systematically investigate the potential human health and environmental effects of HPV chemicals (see Attachment I). Initial work on the HPV Chemicals Program involves collecting available data and undertaking testing necessary to complete a screening information data set (SIDS).

CMA's Board of Directors recently approved recommendations for CMA member involvement in Phase II of the OECD HPV Chemicals Program and discussions are beginning within the U.S. and OECD regarding allocation of Pilot Program Phase II chemicals (see Attachment II). Your company has been identified from publicly available records as producing one or more of the HPV chemicals to be evaluated in Phase II. We are seeking commitments from individual companies in anticipation of a January 1991 OECD Ministerial meeting. At that time, producers taking lead responsibility for Phase II chemicals will be formally identified. The number of CMA member companies making commitments to take lead responsibility for Phase II chemicals will be reported to the Board at its November 1990 meeting.

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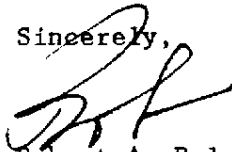
Mr. John D. Burns

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If you have any questions about the OECD HPV Existing Chemicals Testing Program, please call Kathryn A. Rosica, Director, Health Programs, at 202/887-1282 or Sandra L. Tirey, Associate Director, Health Programs, at 202/887-1274.

Sincerely,



Robert A. Roland
President

cc: Mr. Thomas G. Grumbles, Health and Safety Contact
Mr. William McClain, International Contact

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ATTACHMENT I

OVERVIEW OF THE OECD HIGH PRODUCTION VOLUME (HPV) EXISTING CHEMICALS TESTING PROGRAM

The Organization for Economic Cooperation and Development (OECD), an organization of 24 industrialized countries, has initiated a voluntary program to systematically investigate the potential human health and environmental effects of high production volume (HPV) chemicals. A Screening Information Data Set (SIDS) has been developed for an initial evaluation of the potential hazards of these chemicals. In Phase I of the Pilot Program, 53 HPV chemicals were chosen from a list of 147 HPV Priority 1 chemicals that are produced in excess of 10,000 tons per year by any OECD country and for which little or no safety data are publicly available. In Phase I, fourteen (14) OECD member countries, including the U.S., agreed to 1) take the lead on specific chemicals; 2) exchange existing data on these chemicals; and 3) conduct testing needed to complete the SIDS for each chemical. Total testing costs per chemical will depend on the extent of existing data and could cost up to \$200,000.

U.S. chemical producers have volunteered to take the lead on nine of the 53 Phase I HPV chemicals. One company is taking the lead on two chemicals, five companies are taking the lead on one chemical each, and the Silicones Health Council is taking the lead on two chemicals. U.S. chemical producers and EPA have also provided existing data on the Phase I HPV chemicals to the appropriate national SIDS contacts or U.S. producers.

The U.S. chemical dossiers, including available data and proposed testing plans, were reviewed in September at a meeting hosted by the Conservation Foundation. This meeting included representatives from federal government agencies, environmental groups, academia, and industry. The purpose of the meeting was to develop consensus views for the U.S. delegation to carry forward in subsequent OECD meetings. OECD member countries will meet in November 1990 to review the 53 HPV chemical dossiers and proposed SIDS testing plans. This meeting will provide an important opportunity to judge the viability of the OECD program. The ability of participating countries to reach consensus on evaluating existing data and proposals for testing is key to continued participation of both OECD countries and individual chemical producers. SIDS testing on the 53 pilot phase HPV chemicals is expected to begin in December 1990, with testing completed by December 1991.

Phase II of the OECD HPV Existing Chemicals Testing Program is expected to begin in early 1991 with formal allocation of the remaining HPV Priority 1 chemicals to OECD countries. Collection and sharing of existing data is to be completed by August 1991. Review of existing data and SIDS testing proposals is scheduled for December 1991, and SIDS testing is to begin in April 1992.

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ATTACHMENT II

OECD
HIGH PRODUCTION VOLUME PRIORITY 1 CHEMICALS
PHASE II CANDIDATES

Alcohols

- *2-Methyl-3-buten-2-ol (115184)
- 2-Methyl-3-buten-2-ol (115195)
- *1-Tetradecanol (112721)
- *1-Tridecanol (112709)

Aldehydes and Ketones

- 2-Ethyl-2-hexenal (645625)
- 3-Hydroxy-2,2-dimethylpropanal (597319)
- *3-Nitrobenzaldehyde (99616)
- Pentanal (110623)

- 2,6-Dimethyl-4-heptanone (108838)
- Ethenone (463514)

Amides and Sulfonamides

- N,N-Bis(2-hydroxyethyl)-9-octadecenamide (93834)
- *Diazenedicarboxamide (123773)
- *N,N'-1,2-Ethanediylobis-octadecenamide (110305)
- (Hydroxymethyl)urea (1000824)
- *3-Oxo-N-phenylbutanamide (102012)

Amines and Nitro Compounds

- N,N'-Bis(3-phenyl-2-propenylidene)-1,6-hexanediamine (140738)
- 5-Amino-1,3,3-trimethylcyclohexanemethylamine (2855132)
- N-Methyl-N-octadecyl-1-octadecanamine (4088226)
- 1-Tetradecanamine (2016424)
- *N-Phenyl-1,4-benzenediamine (101542)
- 2-Methylallyl 2-nitrophenyl ether (13414545)

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*Manufactured by CMA member companies not participating in the first phase of the pilot program.

Carboxylic Anhydrides, Acids, Esters and Salts

Butanoic acid anhydride (106310)

*Benzene-1,2,4-tricarboxylic acid (528449)

Diethyl 2-butenedioic acid (E) (623916)

2,2-Dimethylpropanoic acid (75989)

*3-Nitrobenzoic acid (121926)

3-Hydroxy-4-[(4-methyl-2-sulphophenyl)azo]-2-naphthalenecarboxylic acid,
calcium salt (5281049)

Decyl 9-octadecenoate (Z) (3687465)

2,2-Dimethyl-1-(1-methylethyl)-1,3-propanediyl 2-methylpropanoate
(6846500)

3-Hydroxy-2,2-dimethylpropyl 3-hydroxy-2,2-dimethylpropanoate (1115204)

*Methyl dodecanoate (111820)

*Methyl octanoate (111115)

Methyl 3-oxo-2-pentyl cyclopentaneacetate (24851987)

Methylene butandioate (97654)

*Octyl octadecanoate (109364)

Chlorinated and Fluorinated Compounds

*1-Chlorobutane (109693)

*1-Chlorooctane (111853)

1,3-Dichloro-2-propanol (96231)

*1-Chloro-4-(trifluoromethyl)benzene (98566)

*1,3-Dichloro-2-methylbenzene (118694)

*2,4-Dichloro-1-methylbenzene (95738)

Diols and Glycol Ethers

*1,6-Hexanediol (2629118)

*2-[2-(2-ethoxyethoxy)ethoxy]ethanol (112505)

[(1-Methyl-1,2-ethanediyl)bis(oxy)bispropanol (24800440)

Methoxymethanol (4461523)

Heterocyclics

2-(1,3-Dihydro-3-oxo-2H)-3H-indol-3-one (sic) (482893)

4,5-Dihydroxy-1,3-bis-2-imidazolidinone (sic) (1854268)

*5-Ethyl-2-methylpyridine (104905)

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*Manufactured by CMA member companies not participating in the first
phase of the pilot program.

Hydrocarbons, Aliphatic

*Decane (124185)
Dodecane (112403)
Pinane (473552)
*Tetradecane (629594)
*Tridecane (629505)
*Undecane (1120214)

*1-Butene (106989)
1,3-Cyclopentadiene (542927)
6,6-Dimethyl-2-methylene(1S)bicyclo[3.1.1]heptane (172673)
*1-Dodecene (112414)
*1-Hexene (592416)
*2-Methyl-2-butene (513359)
2-Methyl-1-propene (115117)
*1-Octene (111660)
*1-Tetradecene (1120367)

Hydrocarbons, Aromatic

*1,4-Diethylbenzene (105055)
1-Phenyldodecane (123013)
1-Phenyltridecane (123024)
1-Phenylundecane (6742547)

Nitriles

2-Hydroxypropanenitrile (78977)
2-Pentenitrile (26294984)
3-Pentenitrile (4635874)

Organometallics

Decanol aluminum salt (26303548)
Dodecanol aluminum salt (14624158)
Octanol aluminum salt (14624136)
Tetradecanol aluminum salt (67905322)
Tridodecyl aluminum (1529595)
Tris(decyl) aluminum (1726665)

[[N,N'-1,2-Ethanediyibis[N-(carboxymethyl)glycinato]](4-)-N,N',O,O'
ferrate(1-) (21265509)
Tetrakis[tris(methylphenyl)phosphite-P] nickel (T-4) (35884663)

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Peroxides

Bis(1-methyl-1-phenylethyl) peroxide (80443)
Phenylenebis(1-methylethylide) peroxide (25155253)
1-Phenylethyl hydroperoxide (3071327)
Pinanyl hydroperoxide (28324529)

Phenols

3-Methyl-4-nitrophenol (2581342)
*4-Octylphenol (1806264)
2,4,6-Trimethylphenol (527606)

Phosphorous and Sulfur Acids, Esters and Salts

Dibutyl phosphate (107664)
Methylphenyl diphenyl phosphate (26444495)
Diethyl phosphonate (762049)
*Tris-(1-chloro-2-propyl) phosphate (13674845)

*O,O-Diethyl phosphorochlorodithioate (2524041)
O,O-Diisooctyl phosphorodithioate, zinc salt (28629665)
*O,O-Dimethyl phosphoramidodithioate (17321470)
*O,O-Dimethyl phosphorochlorodithioate (2524030)

O-(1-Methylethyl) carbonodithioate (140932)

Ethenesulfonic acid, sodium salt (3039836)
2,2'-(1,2-Ethenediyl)bis-(5-amino)benzenesulfonic acid (81118)

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*Manufactured by CMA member companies not participating in the first phase of the pilot program.

CHEMICAL MANUFACTURERS ASSOCIATION
REPLY FORM

PARTICIPATION IN PHASE II OF THE
OECD HIGH PRODUCTION VOLUME EXISTING CHEMICALS TESTING PROGRAM

Vista Chemical Company manufactures the following chemical and agrees to take lead responsibility for sponsoring it in the OECD HPV Existing Chemicals Testing Program:

1-Tetradecanol (112721)

Vista Chemical Company prefers to use the following option to manage our activities in the OECD HPV Existing Chemicals Testing Program: (please check one)

— Option A:

Our company will take lead responsibility for the chemical listed above, including data collection and testing, and will interact directly with EPA, which serves as the U.S. representative to the OECD.

— Option B:

Our company will take lead responsibility for the chemical listed above, including data collection and testing. We request that CMA establish a CHEMSTAR panel of individual producers of different chemicals to interact with EPA and the OECD on behalf of producers of these different chemicals.

(The approximate cost to participants will depend on the number of companies and will be discussed with interested companies.)

— Option C:

Our company is interested in forming a consortium of co-producers of the above chemical to share costs of collecting data and conducting testing. We request that CMA establish a chemical specific panel or augment an existing panel within the CHEMSTAR program.

(The approximate cost to participants will depend on the scope of the program and will be determined by CMA and interested companies.)

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PARTICIPATION IN PHASE II OF THE OECD HPV CHEMICALS PROGRAM

COMMENTS:

Vista Chemical Company designates the following individual to
serve as the lead representative for our company in ~~the~~ OECD program:

Name: _____
Title: _____
Address: _____

Phone: _____
Fax: _____

This reply form was completed by:

Name: _____
Title: _____
Phone: _____

Please return completed reply form by COB Friday, October 26,
1990, to:

Sandra L. Tirey
Associate Director, Health Programs
Chemical Manufacturers Association
2501 M Street, NW
Washington, DC 20037

202/887-1274 (phone)
202/887-1237 (fax)

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