

July 26, 2002

Elizabeth J. Moran, Ph.D.
American Chemistry Council Olefins Panel
Panel Manager
1300 Wilson Boulevard
Arlington, VA 22209

Dear Dr. Moran:

We have conducted a review of the Resin Oils and Cyclodiene Concentrates category submitted by the Olefins Panel as part of their commitment made under the HPV Challenge Program. Our analysis focused initially on the category justification and implementation strategy with the aim of determining the feasibility of achieving the stated objective of characterizing members of this group with the proposed design.

Our analysis concluded that, while the category proposal appears to be a reasonable approach to characterization of process streams from the ethylene process unit, the implementation strategy was very difficult to grasp for the following reasons.

1. The use of a defining substance (dicyclopentadiene dimer, DCPD) as the preferred approach to characterize members of this category does not appear compatible with the wide range of chemical compositions represented by the subject streams.
2. The Table on page 2 suggests dividing the streams into three subcategories, however the same logic is not present in the Assessment Plan Table (Table 3, page 8).
3. It is not clear why MCPD is being tested (as stated in the text, although it is not reiterated in Table 3, page 28) if the basis for the category is DCPD.
4. Based on #3 above, the inclusion or role of MCPD in the category is unclear.

In addition, the organization and presentation of data in the document could be improved to increase clarity and facilitate analysis. For example, there is no explicit relationship between the CAS numbers comprising the category and the different streams. Similarly, there is no linkage between chemicals for which data are presented and the streams that these chemicals represent.

I encourage the Olefins Panel to take the necessary steps to make this category viable. We are prepared to proceed to data adequacy determinations as soon as we get your response.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the HPV Challenge Program Web site "Submit Technical Questions" button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

Sincerely,

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Oscar Hernandez, Director
Risk Assessment Division