

August 21, 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 Fuel Oils 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, one of the eight streams (heavy pyrolysis fuel oil) described as containing "considerable" polycyclic aromatic hydrocarbons (page 2 of submission, but no information provided in Table 3 for the same stream) would not be consistent with the proposed category structure. Overall, the implementation strategy was difficult to grasp. There appears to be more dissimilarities than similarities among the eight streams characterized in Table 3. The proposal suffers from deficiencies in chemical nomenclature and inconsistent use of corresponding CAS numbers. The organization and presentation of data in the document should 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. For example, how different is the biphenyl feedstock (CAS # 68989-41-3 - not a CAS # in the category) - which was the test material in several studies for which robust summaries were supplied - from the biphenyl concentrate stream in the proposed category?

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