

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 High Benzene Naphtha 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 difficult to grasp. The proposed strategy describes different approaches to characterization of this category ranging from a lead chemical component (benzene; other?), data on other components in the various streams, and analog data (both for individual components and analogous streams). The proposal, however, does not articulate how the desired characterization of component streams will be achieved. In addition, the organization and presentation of data in the document should be improved to increase clarity and facilitate analysis. There is no explicit relationship between the CAS numbers comprising the category and the different streams. For example, for which stream is the "Dripolene" acute toxicity data to be used for?

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