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Functional Chemicals

August 26, 2002

Oscar Hernandez, Director  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attn: Right-To-Know

Re: Response to EPA Comments on HPV Test Plan for Phosphoryl Chloride, Polymer with Resorcinol, Phenyl Ester

Dear Mr. Hernandez:

Akzo Nobel Functional Chemicals LLC is pleased to respond to your letter of June 17, 2002 and to the Agency's comments on our proposed Test Plan. We are in agreement with the comments and have prepared a revised Phosphoryl Chloride, Polymer with Resorcinol, Phenyl Ester Test Plan, a copy of which accompanies this letter.

Our company is committed to the October 14, 1999 letter, which emphasizes the use of existing, scientifically sound data wherever possible. To be sure that all available data for this product were being examined, we searched company files for reports and other documents, reviewed several electronic databases for published information, and asked trade associations to conduct searches of their respective records. All of the reports, publications, and other documents pertaining to phosphoryl chloride, polymer with resorcinol, phenyl ester were carefully examined and where possible, data from these documents were included in the robust summaries. This effort has significantly reduced out testing requirements.

Most of the Agency's comments pertain to the identity of the test substance that was used in the various studies. The Agency also commented on the existence of a second CAS registry number and has asked for clarification as to whether it also represents phosphoryl chloride, polymer with resorcinol, phenyl ester. The two CAS registry numbers will be addressed in the revised dossier section that discusses chemical identity. In essentially all of the studies described in the robust summaries, the test substance consisted of the commercial product, Fyrolflex RDP. The product has been described as resorcinol bis(diphenylphosphate) and as RDP, and in a few studies it is described by as CR-733S. The relationship of these "identities" to each other and to the commercial product will be clarified in the revised robust summaries. Since the commercial product was used in most of the tests, the results provide a valid assessment of the product.

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In the Phosphoryl Chloride, Polymer with Resorcinol, Phenyl Ester Test Plan originally submitted to the Agency, Akzo Nobel Functional Chemicals LLC committed to conduct boiling point, octanol/water partition coefficient, and photodegradation tests. In the revised Test Plan, the company commits to also conduct vapor pressure and water solubility tests. Also, where requested by the Agency and where possible, we will include additional study details in revised robust summaries.

Akzo Nobel Functional Chemicals LLC supports the Agency's conclusion that no further ecological effects or health effects testing is needed for phosphoryl chloride, polymer with resorcinol, phenyl ester. The physicochemical and environmental fate tests identified in the revised Test Plan will be conducted within the next twelve months.

We appreciate the Agency's comments on our robust summaries and the recommendation that we conduct two additional tests. We believe the enclosed revised Test Plan now includes all of the required tests.

Sincerely yours,

William F. Gentit  
Manager, Regulatory Affairs

cc: Richard Hefter – EPA