PHT INTERNATIONAL, INC.
7422 Carmel Executive Park, #202
Charlotte, NC 28226
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November 14, 2006

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Document Control Office (7407)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Attn: 8(d) Health and Safety Reporting Rule
(Notification and Reporting)

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Re: 40 CFR Part 716
EPA – HQ – OPPT – 2005-0055; FRL-7764-7
RIN 2070-AB11

Dear Sir or Madam:

The purpose of this letter is to comply with 40 CFR 716 and the Final Rule, issued pursuant to section 8(d) of the Toxic Substances Control Act which requires manufacturers (importers) of the chemicals listed in the document in the category of of voluntary High Production Volume (HPV) Challenge Program orphaned chemicals to report certain unpublished health and safety data to the EPA.

1. Identification of the rule

The test rule is contained at 40 CFR 716 section 8(d)

2. Name, address, and telephone number of the party as primary technical contact

Jean Smith
PHT International, Inc.
7422 Carmel Executive Park Drive Suite 202
Charlotte, NC 28226
Tel: 704-554-9657
Fax: 704-554-8098

CONTAIN NO CBI

Contact : same

3. Identification of the substances listed on the HPV program of orphaned chemicals:

Name	CAS RN	Quantity imported Fiscal Year 2005
Methanone, (2-hydrorxy-4-methoxyphenyl1)phenyl-	131-57-7	1000 kg
Benzene, 1-Chloror-4-(trifluoromethyl)-	98-56-6	135000 kg

4. Submission of Test Studies
PHT has no existing health and safety test studies on the above two chemical products. Therefore, we have no test items to submit.

PHT International, Inc. is a small importing business which has only 8 full time employees and 2 part time employees.

Should the agency staff have any questions whatsoever with regard to any aspect of the foregoing, they should contact the undersigned.

Sincerely,

Jean Smith

Jean Smith

Email : jsmith@phtchemical.com

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