

ANA TRADING CORP., U.S.A.

MR282220

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FAX : (310) 354-6908

January 7, 2005

8EHQ-0105-15578

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Document Processing Center (7407M)
EPA East - Room 6428, Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington D.C. 20460-0001

Subject: 8EHQ-0504-15578A and 8EHQ-0904-15578B

CONTAINS NO CBI

Dear Sir or Madam:

This letter is provided to response to the letter sent to us from Mr. Terry R. O'Bryan, Environmental Scientist, High Production Volume Chemicals Branch, dated December 27, 2004. (Attached please refer a copy of letter dated 12/27/04.)

First of all, I would like to apologize that we, ANA Trading Corp., U.S.A., as the U.S. importer of the carbon fiber material, did not submit the TSCA 8(e) notice to the EPA this time. To document the telephone conversation I had with Mr. O'Bryan on September 23, 2004 and December 23, 2004, I would like to explain why we did not submit the subject notice to the EPA.

At first, I would like you to understand that the subject non-U.S. exporter is the actual developer of the carbon fiber material (Product). In fact, I had a discussion with the subject exporter to determine who should take responsibility to submit such notice to the EPA as soon as the report was completed at the exporter and that was just prior to such submission was made. Then the both parties had agreed that the exporter should submit it to the EPA as the developer of the material since we did not have any knowledge, concern or recognition with regards to the TSCA jurisdiction. The both parties simply had decided that the developer would be the one who should have taken

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responsibility to generate and submit the report to the EPA. All the submitted data and reports were sent to us by the exporter upon completion of such submission to the EPA and are currently in our possession.

It has also been requested by Mr. O'Bryan to confirm whether all development activities on this particular carbon fiber material have been abandoned as stated in the letter written by the exporter, which the EPA has received on August 30, 2004. I hereby acknowledge and confirm that, as it was stated in the foregoing letter, all activities have been officially abandoned in June 2004 since the material was not adopted by the potential end user in the U.S. The discontinuance of the development was officially notified in writing to the potential end user as well in the beginning of July 2004.

Lastly, I would like to confirm here that the U.S. importer should take responsibility to submit all data and report to the EPA. And from now on, I will assure that we will fulfill the requirement if there is additional information reportable under TSCA 8(e).

Should you have any question or require further information, please directly contact the undersigned anytime at 310-965-8161 (direct line) or email: yishikawa@anatu.com

Sincerely your,



You Ishikawa, Senior Manager
Machinery Department

Attachment:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

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05
JAN 11 AM 10:54

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

December 27, 2004

ANA Trading Corp., U.S.A
Attn: Yoh Ishikawa, Senior Manager
Gateway Towers East
970 West 190th Street
Suite 600, M/S 30
Torrance, CA 90502

RECD ON
1/6/05

SUBJECT: 8EHQ-0504-15578A and 8EHQ-0904-15578B

Dear TSCA 8(e) Submitter:

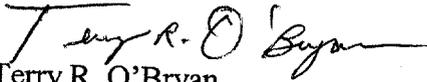
As part of EPA's responsibility to evaluate and publicize TSCA (Toxic Substances Control Act) 8(e) submissions, the Office of Pollution Prevention and Toxics conducts preliminary screens of all 8(e)s and routinely requests additional information from submitters to complete this preliminary screen. Please confirm that all development activities on the carbon fiber material, which is the subject of the above referenced TSCA Section 8(e) submissions, have been abandoned, as stated in the undated letter from your importer to EPA received on August 30, 2004. Also to document our telephone conversations 09/23/04 and 12/23/04, please explain why your company, as the U.S. importer of the carbon fiber material, did not submit the TSCA 8(e) notice rather than the exporter, who is outside the U.S. and not under TSCA jurisdiction. Were the submitted data in your possession at the time they were submitted to EPA by the exporter on 2/12/04? Please be advised that it is your company as the U.S. importer and not the non-US exporter who has the reporting obligation to EPA if there is additional information reportable under TSCA Section 8(e).

Enclosed are the first pages of these TSCA 8(e) submissions from your exporter and a copy of "Support Information for Confidentiality Claims". Please cite the assigned 8EHQ number and address your response to:

Document Processing Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (or 1201 Constitution Avenue, NW for courier service)
Washington, D.C. 20460-0001

Please direct any questions regarding this request to me at (202) 564-7656 or email
OBRYAN.TERRY@EPA.GOV

Sincerely,

A handwritten signature in black ink that reads "Terry R. O'Bryan". The signature is written in a cursive style with a large, stylized "O" in the middle.

Terry R. O'Bryan
Environmental Scientist
High Production Volume Chemicals Branch

Enclosures