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SCHEENECTADY CHEMICALS, INC.

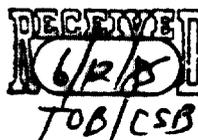
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Robert P. Yunick
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SEQUENCE F

~~CONFIDENTIAL~~
June 3, 1985

Document Control Officer
(ATTN: T. O'Bryan)
Office of Toxic Substances
401 M Street, SW
Washington, D. C. 20460



Dear Mr. O'Bryan:

I am writing in response to Mr. F. D. Kover's letter of April 23, 1985 concerning preparation of a Chemical Hazard Information Profile on 4-Nonylphenol, commonly known commercially as Nonylphenol (NP) or para-Nonylphenol (PNP). Schenectady Chemicals, Inc. is a manufacturer of two grades of PNP: High-Purity Grade and Technical Grade. Their approximate assays are as follows:

	<u>High-Purity</u>	<u>Technical</u>
PNP, % min. .	95	87-88
<u>Ortho</u> -Nonylphenol, %	4+	10-12
Dinonylphenol, % max.	-	2

In 1984, SCI manufactured approximately 18 million pounds of PNP for sale and internal use. In our experience all of our PNP is used as an industrial intermediate. It is reacted or chemically transformed into other derivatives prior to consumer use. We are not aware of any direct consumer use of PNP. Its principle uses are:

Surfactants/Demulsifier
Antioxidant/Stabilizer
Synthetic Resins

In the first case, it is reacted with various alkylene oxides to form monionic surfactants for industrial use. Some of these surfactants are used as demulsifiers in oil well exploration. In the second case it is converted to tris (para-nonylphenyl) phosphite for use as an FDA-approved antioxidant additive to plastics. In the third case it is reacted with formaldehyde to form solid resins for further industrial processing.

SCI has manufactured and used PNP for about 10 years. Since the product is a non-volatile, non-water-soluble, viscous liquid the amount of it exposed in the work place or environment is minimal. As a liquid it is handled in bulk, and pumped through

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closed piping systems. There is no need for workers to handle it as they might handle a solid product in fiber drums or bags.

In our own internal resin making operation where we use PNP, it is not only stored and pumped in closed systems, but it is reacted in closed systems. By-product water streams from this process are first precipitated with flocculating agents. These precipitates are incinerated at high temperature to eliminate environmental release. Following precipitation, the water stream is then passed through a carbon absorption bed to further remove organic contents. The absorbate from the carbon is also incinerated.

In our 10 years of making, handling and using PNP, we have not experienced any employee exposure problems that are attributable to PNP.

In many respects PNP is used similarly to para-tert.-octylphenol (PTOP). PTOP is under study currently by EPA in cooperation with the Octylphenol Program Panel of CMA in Washington. You may want to consult documents filed with EPA by the Panel concerning uses, handling, exposure, etc. of PTOP. Most of this information is applicable to PNP.

Very truly yours,

SCHENECTADY CHEMICALS, INC.



Robert P. Yunick

RPY/cbd