



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 8 1999

OFFICE OF  
SOLID WASTE AND EMERGENCY  
RESPONSE

Courtney M. Price, Vice President  
Chemstar  
1300 Wilson Boulevard,  
Arlington, VA 22202

Dear Ms. Price:

Thank you for your letter of October 21, 1999, expressing your concern about labeling phenol as a persistent, bioaccumulative, and toxic (PBT) chemical. As you know, phenol appeared as one of 53 chemicals proposed by the Agency for inclusion on the Draft Resource Conservation and Recovery Act (RCRA) PBT List. This Draft List, when final, will serve as the focus of the Agency's voluntary waste minimization initiatives. The Draft List was released for public comment on November 9, 1998, and the public comment period closed on February 16, 1999. Phenol was included on the Draft List because of its potential for ecosystem impacts and because of studies indicating a relatively high level of persistence.

During the comment period we also received a number of public comments expressing concerns similar to those expressed in your letter suggesting only chemicals that score high for "P", "B", and "T" should be placed on the list, as well as your written comments expressing concern regarding the placement of phenol on the Draft List. Let me assure you that we will review all related comments and issues before deciding whether to include phenol on the Final List. The list is currently scheduled for finalization in February, 2000. It would be impractical for us to provide final decisions on individual chemicals ahead of that date.

Again, thank you for providing your views on this matter. We appreciate your patience while we review the many comments submitted to us.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Berlow".

James R. Berlow, Director  
Hazardous Waste Minimization and Management  
Division

OSW-9966

Faxback 14527